



Management of Offender Data and Records by the Mississippi Department of Corrections

A Report to the Mississippi Legislature
Report #673
September 13, 2022



PEER Committee

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Jerry Turner, Vice-Chair
Becky Currie, Secretary

Senators:

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Representatives:

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The Committee assigns top priority to written requests from individual legislators and legislative committees. The Committee also considers PEER staff proposals and written requests from state officials and others.



Joint Legislative Committee on Performance Evaluation and Expenditure Review

PEER Committee

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September 13, 2022

Honorable Tate Reeves, Governor
Honorable Delbert Hosemann, Lieutenant Governor
Honorable Philip Gunn, Speaker of the House
Members of the Mississippi State Legislature

On September 13, 2022, the PEER Committee authorized release of the report titled *Management of Offender Data and Records by the Mississippi Department of Corrections*.

Representatives

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This report does not recommend increased funding or additional staff.

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CONCLUSION: MDOC maintains unreliable, inaccurate, and incomplete data and records for some offenders under the state's custody, which could impact decisions made by internal and external stakeholders (e.g., MDOC staff, the Legislature) and the care and rehabilitation of offenders.



BACKGROUND

MISS. CODE ANN. § 47-5-10 (1972) designates MDOC as the state agency responsible for accepting adult offenders committed by the courts for incarceration, care, custody, treatment, and rehabilitation. As part of its responsibilities, MDOC must maintain up-to-date and complete records for all adult offenders sentenced to its custody and housed within 68 correctional facilities across the state.

MDOC has three main sources for maintaining an offender's record, including:

- **Offendertrak** (i.e., adult offender database management information system);
- **Legato** (i.e., electronic filing cabinet); and,
- **hard copy records.**

MDOC's Division of Records creates an offender's record upon entry, and facility staff across the state have the responsibility of editing and updating these records.

It is critical that offender records and data be complete, accurate, valid, confidential, and available so that internal and external stakeholders can make effective, data-driven decisions regarding offenders.



KEY FINDINGS

- **MDOC has limited controls over user access and permissions, which has resulted in duplicate user accounts and account errors.**

MDOC does not ensure that user access and permissions are aligned with current job responsibilities. Further, it does not consistently assign, update, and remove users from the system, which could affect the security and integrity of offender data.

- **Data in Offendertrak does not consistently match the source documentation scanned into Legato. As a result, some offender records include incomplete, inconsistent, and missing information.**

PEER sampled 100 active offender records and identified several instances of incomplete, missing, and nonmatching offender data, including: missing documentation required by state law and/or MDOC policy, poorly scanned documents in Legato, missing or conflicting level of education data, outdated or missing pictures of offenders, nonmatching social security numbers, and misspelled or incorrect offender names.

- **MDOC's offender program data is unreliable, inaccurate, and incomplete. This limits the effectiveness and efficiency of rehabilitation and re-entry decisions made by MDOC.**

In the sample of 100 active offender records, 66 offenders participated in a program while incarcerated (e.g., alcohol and drug abuse program). None of the records for the 66 offenders who participated in a program were complete and accurate in Offendertrak and/or Legato. For example, records included incorrect dates of program completion and missing certificates of completion.

- **Data in Offendertrak is not consistently updated for all offenders, resulting in outdated and inaccurate records.**

For example, PEER's sample of 100 active offender records resulted in the identification of a deceased offender (as of November 2021) listed as active by MDOC. This offender was housed in another state and never served time with MDOC; however, he was still under the state's jurisdiction. MDOC did not properly maintain this offender's record by determining his status or location.

- **Other data issues observed by PEER include:**
 - unclear and erroneous Offendertrak reports, issues with disciplinary and incident reports, inconsistent reporting of escapees, impossible recorded ages, and system errors in sentence computation when updating some offender records.
- **As a result of MDOC's unreliable data:**
 - the Legislature might not effectively use MDOC's data to make the most informed decisions regarding policy and the funding of the state's correctional system;
 - MDOC staff cannot ensure they are making the most effective and efficient decisions regarding the management of offenders and operation of facilities; and,
 - offenders could be improperly classified, housed in an inappropriate or dangerous location, incarcerated beyond their release date, not earning credit for programming, and unable to effectively re-enter society upon release.
- **Reasons for MDOC's unreliable data include:**
 - issues with Offendertrak (e.g., the system is regularly unavailable to facility staff, produces erroneous reports and incorrect release dates, and lacks automation needed to identify potential data errors or inconsistencies);
 - issues with MDOC's management and processes (e.g., lack of agreement as to which source constitutes an offender's master record, limited training on the use of systems, and inefficient and inconsistent policies and procedures); and,
 - other external issues (e.g., systems at regional facilities, private prisons, and county jails do not interface with Offendertrak).
- **Offendertrak is an outdated and inefficient legacy system that is nearing the end of its useful life and will no longer be supported by the system's vendor as of June 30, 2025.**

MDOC has not begun to plan for transitioning to a new offender management information system. The goals of a new system should be to collect data that is structured to facilitate analysis that can be used by MDOC, prison facility staff, and policymakers to make more informed decisions regarding offenders, and ensure that data entered into the system is accurate and complete.



SUMMARY OF RECOMMENDATIONS

Legislature

To increase the integrity of MDOC's data, the Legislature should consider enacting legislation to require the Mississippi Department of Information Technology Services (ITS) to provide special assistance to MDOC, including but not limited to updating all offender records and planning, selecting, and procuring a new offender management information system. To fund this assistance, the Legislature should consider requiring MDOC to pay ITS expenditures associated with the project. ITS shall itemize its expenditures for each fiscal year in which they are incurred.

MDOC

MDOC should improve its management of offender data by: implementing internal controls (e.g., updating user roles and permissions across all facilities, defining what source constitutes the master record), conducting quality assurance on information produced in its reports, annually reviewing offender programs to ensure proper documentation, and providing annual training for all users on how to effectively use the data systems.

Management of Offender Data and Records by the Mississippi Department of Corrections

Introduction

Authority

The PEER Committee, under its authority granted by MISS. CODE ANN. § 5-3-51 (1972) et seq., authorized a review of the management of offender data and records maintained by the Mississippi Department of Corrections (MDOC).

Scope and Purpose

In conducting this review, PEER sought to answer the following questions:

- How does MDOC maintain records and data for offenders under its jurisdiction?
- What are the standards for management information systems and offender data?
- Has MDOC implemented internal controls to limit user access to Offendertrak?
- Is MDOC's offender data reliable, accurate, and complete?
- What is the impact of MDOC's unreliable offender data?
- Why is MDOC's offender data unreliable, inaccurate, and incomplete?
- How can MDOC improve the reliability, accuracy, and completeness of offender data as it transitions to a new offender management information system?

Method

To determine the reliability, accuracy, and completeness of offender data:

- PEER conducted a records comparison to trace data between an offender's electronic hard copy record (i.e., Legato) and MDOC's offender data management information system (i.e., Offendertrak). To conduct this comparison, PEER reviewed a random sample of records for 100 active offenders, i.e., individuals either in general custody population, community corrections, other custody (e.g., offenders housed in other states), at-large, or off-grounds medical. PEER's review did not include parolees or probationers.

In the records comparison, PEER reviewed various information such as demographics, sentencing, classification, offender programs and treatment, and victim notification.

- PEER utilized the Clopper-Pearson binomial method to generalize the results of the sample to the entire population of active offenders. This method makes no assumptions regarding the population and is a commonly cited method for determining confidence intervals (i.e., a range of values that are believed to contain, with a certain degree of probability, the true population value). Because this method is conservative, it might overestimate the size of the confidence intervals, but it is guaranteed to never underestimate those intervals.

PEER also:

- conducted prison facility visits to observe management of offender records and data at three state facilities (i.e., Central Mississippi Correctional Facility, Mississippi State Penitentiary, and South Mississippi Correctional Institution), one private prison (i.e., Wilkinson County), two county/regional facilities (i.e., Bolivar County and Stone County), and two approved county jails (i.e., Grenada County and Forrest County);
- interviewed staff at MDOC's Central Office, the Parole Board, and the Mississippi Department of Information Technology Services (ITS);
- reviewed applicable state laws, rules, and regulations governing MDOC;
- reviewed and analyzed relevant data and documentation provided by MDOC, including:
 - policies, procedures, and handbooks utilized by MDOC and prison facilities;
 - *Mississippi's Enterprise Security Policy*;
 - annual and monthly reports and other ad hoc documents and reports;
 - contracts and modifications for Offendertrak and Legato;
 - offender data; and,
 - staffing information for MDOC's Management Information System (MIS) division;
- researched:
 - data reliability and internal controls for database management by the United States Government Accountability Office (GAO);
 - the importance of management information systems for offender classification and data from the U.S. Department of Justice's National Institute of Corrections (NIC);
 - uses of data to inform decisions by the National Conference of State Legislatures (NCSL); and,
 - common business functions for correction management systems by the Corrections Technology Association;
- reviewed and tested various components of Offendertrak, including reports produced by the system; and,
- analyzed system users and permissions established for access to Offendertrak.

Scope Limitation

Caseload Explorer, another system used to store offender information, is a caseload management software that manages and tracks probationers and parolees. While this is a system used by MDOC and the Parole Board to maintain some records, PEER limited its review to data entered into Offendertrak and uploaded to Legato because those two systems contained the data needed to conduct the records comparison. Additionally, PEER did not review the medical database used by facilities and VitalCore Health Strategies, LLC, to track medical data for offenders.

How does MDOC maintain records and data for offenders under its jurisdiction?

This chapter sought to answer the following questions:

- What are MDOC’s responsibilities to maintain offender data?
- How does MDOC establish and maintain offender records and data?

What are MDOC’s responsibilities to maintain offender data?

MISS. CODE ANN. § 47-5-10 (1972) designates MDOC as the state agency responsible for accepting adult offenders committed by the courts for incarceration, care, custody, treatment, and rehabilitation. As part of its responsibilities, MDOC must maintain up-to-date and complete records for all adult offenders sentenced to its custody and housed within 68 correctional facilities across the state.

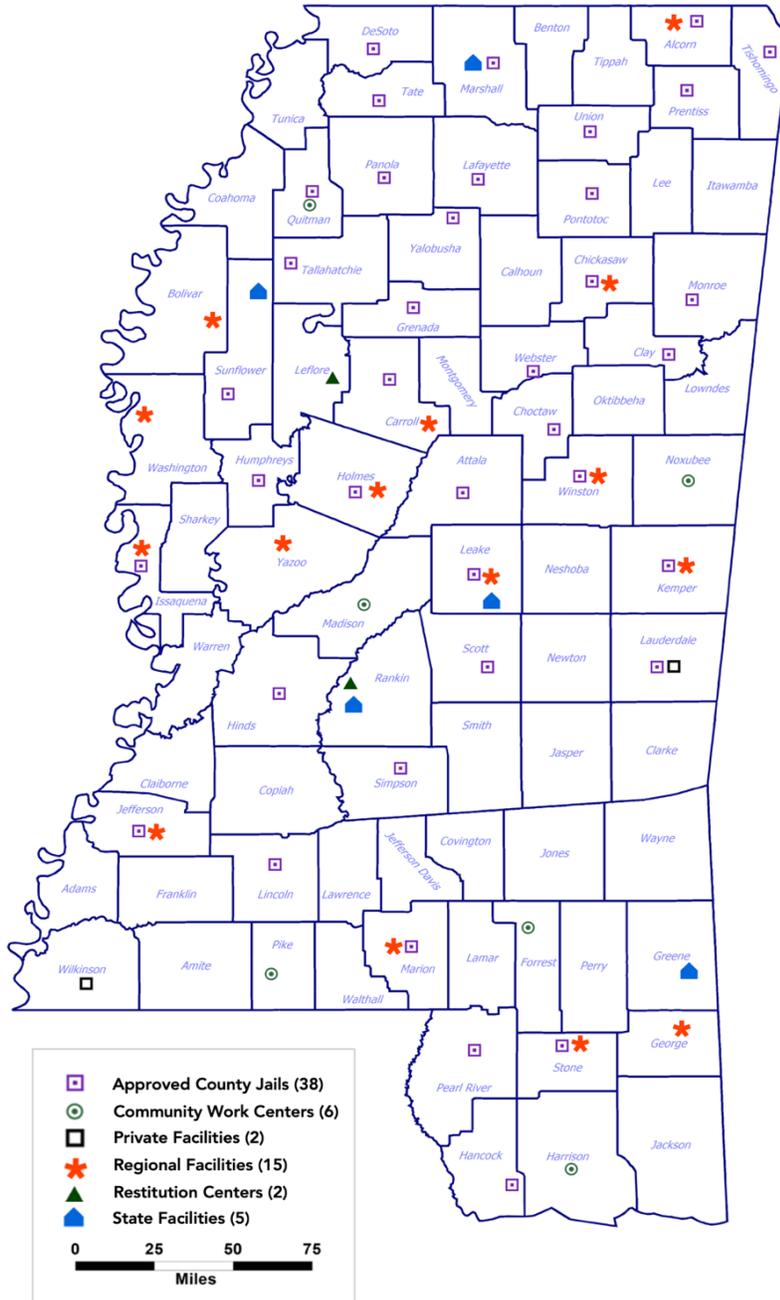
MISS. CODE ANN. § 47-5-10 (1972) designates MDOC as the state agency tasked with the care and custody of adult offenders committed by the courts to serve their sentence with the state. As part of its legal responsibility to provide for the care, custody, and treatment of offenders under its jurisdiction, MDOC is required to maintain data and records for these offenders. MDOC’s offender records and data should be reliable, accurate, and complete to allow MDOC to enhance public safety by providing safe and secure facilities, effective supervision, and successful programs and treatment.

MDOC is responsible for maintaining records and data for its adult offenders housed in one of the following correctional facility types:

- **state facility** (i.e., state-owned and operated);
- **private prison** (i.e., county-owned, privately operated, but overseen by the state);
- **county/regional facility** (i.e., county-owned and operated, but overseen by the state);
- **approved county jail** (i.e., county jails approved by a federal court order to house MDOC offenders);
- **community work center** (i.e., state-owned and operated as an alternative to prison for offenders); and,
- **restitution center** (i.e., county-owned and operated as an alternative to prison for offenders).

Exhibit 1 on page 4 provides a map of the 68 facilities housing MDOC’s adult offenders as of June 29, 2022. MDOC is responsible for ensuring that all of its offenders housed within these facilities have up-to-date and complete records.

Exhibit 1: Mississippi Correctional Facilities Housing MDOC's Adult Offenders as of June 29, 2022



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SOURCE: PEER analysis of documentation provided by MDOC.

How does MDOC establish and maintain offender records and data?

Sources for offender records at MDOC include an electronic management information system (i.e., Offendertrak), an electronic filing cabinet (i.e., Legato), and hard copy records. MDOC's Division of Records creates an offender's record upon entry, and facility staff across the state have the responsibility of editing and updating these records.

According to MDOC's policies and procedures, MDOC maintains a master record on all individuals sentenced to the care, custody, or control of MDOC. This includes individuals incarcerated or under some form of community supervision (e.g., parole, probation, earned release supervision). All master records must include court documents (e.g., the indictment, criminal disposition, and sentencing order). Other types of information and data maintained in an offender's master record include but are not limited to:

- **Offender Commitment and Sentencing:** e.g., sentence computation, presentence jail time, National Crime Information Center (NCIC) reports;
- **Demographics:** e.g., photograph, fingerprints, SSN, FBI number, addresses;
- **Classification:** e.g., initial classification, reclassification, new arrival orientation, signed release of information, program rules and disciplinary policy, risk and needs assessment;
- **Offender Behavior:** e.g., incident history and rule violation reports;
- **Programs and Treatment:** e.g., documentation enrolling the offender into programs and treatment, certificates of completion;
- **Victims:** e.g., victim notification requests;
- **Parole and Release:** e.g., parole actions, release certificates, revocations; and,
- **Other:** e.g., visitation history.

MDOC has multiple sources for maintaining an offender's record. These sources primarily include Offendertrak, Legato, and hard copy records. A description of each source is briefly described below.

- **Offendertrak:** MDOC's adult offender management information system contains over 5,000 data fields and provides data on offenders including but not limited to photographs, demographics, location, sentencing information (e.g., offense, length of sentence), incidents and disciplinary action, and classification. MDOC has utilized this computerized system since September 2003.
- **Legato:** MDOC's electronic filing cabinet for offender records is an automated document imaging system that provides for scanning, indexing, storage, and retrieval of documents. Legato should include all original documentation supporting data entered into Offendertrak (e.g., court documents, initial classification records). MDOC has utilized this electronic filing cabinet since the beginning of 2003.
- **Hard copy records:** These are created by MDOC for each offender during the initial classification process at Central Mississippi Correctional Facility (CMCF) and should serve as the cumulative history of the offender. Historically, MDOC has always maintained hard copy records in addition to any database or electronic filing systems used.

Refer to
discussion on
page 50



MDOC considers each source to be an offender's official record. The source MDOC uses to provide information depends on the request and specific data needed. In theory, the information contained in each source should match. However, none of the sources represent a complete record for offenders.

MDOC's Division of Records (Records) located at the Central Office establishes an offender's record in Offendertrak, which generates a unique offender number for each individual sentenced to serve time under MDOC's jurisdiction. An offender's record is updated by facilities throughout the incarceration process, and then the hard copy is destroyed once the sentence has been served.

Exhibit 2 on page 7 provides a flowchart of MDOC's process to establish and maintain offender records as described in its policies and procedures.

Exhibit 2: Flowchart of Offender Records as Described in MDOC's Policies and Procedures



SOURCE: PEER analysis of MDOC's policies and procedures and interviews with facility staff.

What are the standards for data management information systems and offender data?

Internal controls, including information system controls, for offender management information systems must be developed and implemented successfully to ensure data integrity (i.e., completeness, accuracy, consistency, and availability of data). Data integrity is essential to making sound decisions regarding individual offenders (e.g., decisions related to classification, discipline, offender programs and treatment, parole) and supporting broader policy decisions related to corrections.

This chapter sought to answer the following questions:

- What are the internal controls for data management information systems?
- Why is data integrity important?

What are the internal controls for data management information systems?

A key element of any management information system is the successful implementation of internal controls, including information system controls. General information system controls help ensure the proper operation of the system, while application controls help ensure the integrity of the data in the system. Additionally, user controls help ensure that users interact with the system effectively.

Internal controls describe an organization's policies and procedures to ensure accuracy and respond to risk. Information system controls refer to internal controls that depend on the data system's structure and process, including general, application, and user controls. The United States Government Accountability Office (GAO) Federal Information Systems Controls Audit Manual (FISCAM) defines the following terms:

- **General controls:** policies and procedures that apply to all or a large part of the organization's information systems and help to ensure proper operation (e.g., overall security management, access to computer resources, proper authorization, minimization of unplanned interruptions, and recovery of critical operations).
- **Application/business process controls:** automated and manual controls operating the application (e.g., database management information system). These controls govern the data: entered into the system, within the system, and distributed from the system. Additionally, these controls include interface and system controls.
- **User controls:** a subset of general and application controls. They refer to the controls that require anyone using the information system to authenticate themselves through the use of logins and passwords and limit the data and resources that authenticated users can access and the actions they can execute. Access should be limited to individuals with a

valid business purpose. Unnecessary accounts should be removed, disabled, or otherwise secured.

PEER's review focuses primarily on application and user controls for MDOC's offender management information system. Implementation of effective application and user controls results in increased data integrity, including:

- **Completeness controls:** provide reasonable assurance that all data is input into the system, accepted for processing, processed once and only once by the system, and properly included in output.
- **Accuracy controls:** provide reasonable assurance that data is properly recorded and timely, and produces reliable results.
- **Validity controls:** provide reasonable assurance that all recorded data actually occurred, relate to the organization, are authentic, and are properly approved in accordance with management's authorization. Additionally, output should contain only valid data.
- **Confidentiality controls:** provide reasonable assurance that application data and reports and other output are protected against unauthorized access.
- **Availability controls:** provide reasonable assurance that application data and reports are readily available to users when needed.

FISCAM, with audit guidance and control criteria issued by the National Institute of Standards and Technology (NIST),¹ states the importance of implementing policies and procedures to ensure that all data entered into the information system is done in a controlled manner, and is complete, accurate, and valid. The system should:

- be monitored and audited on a regular basis to ensure that any incorrect information in the system is identified, rejected, and corrected in a timely manner;
- be confidential and adequately protected; and,
- have data standards that are defined and maintained, e.g., in the form of a data dictionary.

Data standards are designed to enable systems to easily interoperate and transfer information. Standard definitions for data elements are intended to ensure that users of all systems define the same data in the same way and have common understanding of their meaning.

Inadequate system controls can result in incomplete, inaccurate, and invalid records and data in the system.

¹ The NIST is a physical sciences laboratory and non-regulatory agency of the United States Department of Commerce that works to promote innovation and industrial competitiveness in the United States.

Why is data integrity important?

The better controls a system and agency have to maximize data integrity, the stronger the capacity for decision-making. For example, prison facility staff use data regularly to make decisions regarding the management of offenders (e.g., housing locations, security classifications, and eligibility for parole). Further, the Legislature could use data to make decisions regarding the public policy of the state related to corrections.

Data integrity refers to the overall completeness, accuracy, consistency, and availability of the data. The integrity of offender data is important because the data is not only used by the correctional facility to make decisions regarding offender management and the facility, but it can also be used by various stakeholders, such as the Legislature, to make decisions and implement public policy related to corrections.

Data that has integrity is complete, accurate, consistent, and available.

Exhibit 3 on page 11 provides examples of internal and external stakeholders and the ways these stakeholders can use offender data to make decisions.

As shown in Exhibit 3 on page 11, there are various levels of staff within MDOC that use offender data. One essential use of offender data is for the classification of offenders. The National Institute for Corrections (NIC) produced a report regarding the degree to which management information systems support offender classification decisions. NIC stated that effective classification is dependent on accurate, timely, and relevant information. Additionally, if management information system software and related databases are “poorly designed, poorly implemented, or ineffectively used, the quality of the classification decisions may be substantially undermined.” This statement is true for other decisions made regarding offenders, including decisions related to discipline, offender programs, and parole. It is also true for decisions made to support the organization and the facility, such as planning and goal setting, allocating resources, crowding control, and monitoring workloads.

As shown in Exhibit 3, various external stakeholders use offender data to make decisions. For example, the Legislature uses information (e.g., recidivism rates, prison population counts) provided by the correctional organization to make public policy and funding decisions for corrections. Additionally, offender program data should be reliable and available for employers and businesses to make hiring decisions regarding offenders who are released from prison and have completed programs and treatment.

Internal and external stakeholders rely on the integrity of offender data to make decisions. If the data is not complete, accurate, consistent, and available in a timely manner, it cannot be effectively used to make the best decisions regarding offenders and corrections policy.

Exhibit 3: Examples of Offender Data Uses by Internal and External Stakeholders

Internal Stakeholders					
Administration (overall organization)	Prison Facility Managers	Unit Managers	Operations (case managers)	Parole Board	Offenders
Planning and goal setting Resource allocation Monitoring goal/policy attainment Efficiency and effectiveness of the organization Staff skills Public relations Documentation accountability Feedback for staff training purposes	Problem “alerts” identified by routine monitoring Crowding control Evaluation of new programs Facility planning Explanation of critical incidents	Monitoring unit performance Monitoring population trends Monitoring workloads Compliance with regulations and standards Monitoring quality in the unit	Daily operations Offender housing Classification and security Transportation Data support for classification decisions Case-specific inmate management decisions Program assignments and eligibility	Determining parole eligibility for offenders by reviewing various factors, including but not limited to: current offense, prior offenses, disciplinary history during incarceration, and participation in offender programs	Release dates Safety during incarceration Medical care Education, programming, and credits earned Re-entry
External Stakeholders					
Legislature	Courts and Law Enforcement	Federal Government	Future Employers	Service Providers	The Public
Measuring performance, e.g., overall recidivism and recidivism rates by offender programs Public policy decisions Funding for correctional organizations and facilities	Sentencing Investigations Criminal statistics Crime prevention and criminal identification	Criminal statistics, such as prison population and number of offenders living with HIV Measuring performance Funding grants for offender programs	Hiring decisions based on documentation provided by offenders for successful completion of programs and work during incarceration	Treatment and assessments of offenders after incarceration	Protecting the public’s safety, such as monitoring for escapes

SOURCE: PEER analysis of information reported in the National Institute of Corrections’s report, *The Emerging Role of Management Information Systems*, published in 2004 and the Integrated Justice Information System Institute, “Value of Corrections Information: Benefits to Justice and Public Safety” as of March 2016.

Has MDOC implemented internal controls to limit user access to Offendertrak?

Internal controls for user access and security are important in ensuring that information and data in the information system is protected from unauthorized manipulation.

This chapter sought to answer the following questions:

- How does MDOC manage user access and permissions to Offendertrak?
- How does MDOC manage security and passwords for Offendertrak?

How does MDOC manage user access and permissions to Offendertrak?

According to best practices, system users should have the least amount of access necessary to perform their jobs (i.e., the concept of least privilege). However, MDOC does not ensure that user access and permissions are aligned with current job responsibilities. Further, MDOC does not consistently assign, update, and remove users from the system. MDOC's limited internal controls has resulted in duplicate accounts and account errors, which could affect the security and integrity of offender data.

MDOC's policies and procedures state that access to applications such as Offendertrak require the approval of a user's supervisor, and should be requested through the automated helpdesk system operated by the Central Office's Management Information System (MIS) division. Supervisors can either email, scan, or mail an Offendertrak access request form to the helpdesk or use the online request form that is electronically sent to the helpdesk once completed.

Exhibit 4 on page 13 shows the access request form that supervisors can use to request access to the system. As shown in Exhibit 4, the form should be used to assign users access to:

- a facility location;
- a permission(s) (e.g., Classification, Records); and,
- a security level (i.e., read, update, warn, print, approval) for each selected permission.

For example, a user can be assigned "Classification" as a permission, and "read only" as a security level. This means the user has access to "Classification" data in Offendertrak, but can only view the data. Users can be assigned multiple permissions with varying security levels. According to MDOC, while supervisors have the authority and discretion in requesting user roles and permissions, it is the practice of MIS staff to review all requests prior to approving the access and permissions requested.

Exhibit 4: Offendertrak User Access Request Form

User's name: _____

User's title: _____

Facility:	Central Office	<input type="checkbox"/>
	CMCF	<input type="checkbox"/>
	MSP	<input type="checkbox"/>
	SMCI	<input type="checkbox"/>

Requested by: _____

Department: _____

Email Address: _____

Other: _____

Authorized Signature & Title: _____

Basic User Inmate Summary Screens and Report (Read & Print Only)

Access to	Update	View/ Read Only	Access to	Update	View/ Read Only
ABE/Voc Ed	<input type="checkbox"/>	<input type="checkbox"/>	Medical	<input type="checkbox"/>	<input type="checkbox"/>
Alerts	<input type="checkbox"/>	<input type="checkbox"/>	MET - Statewide	<input type="checkbox"/>	<input type="checkbox"/>
A&D (Alcohol + Drug)	<input type="checkbox"/>	<input type="checkbox"/>	Movement	<input type="checkbox"/>	<input type="checkbox"/>
ARP	<input type="checkbox"/>	<input type="checkbox"/>	Parole Board	<input type="checkbox"/>	<input type="checkbox"/>
Chaplain	<input type="checkbox"/>	<input type="checkbox"/>	Photo ID (Update/Test)	<input type="checkbox"/>	<input type="checkbox"/>
CID	<input type="checkbox"/>	<input type="checkbox"/>	Pre-Release	<input type="checkbox"/>	<input type="checkbox"/>
Classification	<input type="checkbox"/>	<input type="checkbox"/>	Programs	<input type="checkbox"/>	<input type="checkbox"/>
Commissary	<input type="checkbox"/>	<input type="checkbox"/>	Property	<input type="checkbox"/>	<input type="checkbox"/>
Commissary Admin	<input type="checkbox"/>	<input type="checkbox"/>	Records	<input type="checkbox"/>	<input type="checkbox"/>
Detention Notice	<input type="checkbox"/>	<input type="checkbox"/>	Residence Check	<input type="checkbox"/>	<input type="checkbox"/>
Drug Testing	<input type="checkbox"/>	<input type="checkbox"/>	Residential Address	<input type="checkbox"/>	<input type="checkbox"/>
Extraordinary Occurrence	<input type="checkbox"/>	<input type="checkbox"/>	RVR	<input type="checkbox"/>	<input type="checkbox"/>
HR Department	<input type="checkbox"/>	<input type="checkbox"/>	Transportation	<input type="checkbox"/>	<input type="checkbox"/>
Inmate Mail	<input type="checkbox"/>	<input type="checkbox"/>	Trust Accounting	<input type="checkbox"/>	<input type="checkbox"/>
Intake	<input type="checkbox"/>	<input type="checkbox"/>	Trust Accounting Intake	<input type="checkbox"/>	<input type="checkbox"/>
ILAP → Interstate Compact	<input type="checkbox"/>	<input type="checkbox"/>	Use of Force	<input type="checkbox"/>	<input type="checkbox"/>
Maintain Person	<input type="checkbox"/>	<input type="checkbox"/>	Visitation	<input type="checkbox"/>	<input type="checkbox"/>

TPX Login for remote Access to Mainframe
 SAAS Access:
 Automon Caseload Explorer Access: (Non Probation/Parole Officers must provide justification)

Log Type General
 Requests
 Victim Log
 Log Type - Transfer
 Victim Notification

SOURCE: MDOC.

FISCAM states that controlling user access is an internal control for information systems, and users should be assigned based on the principle of least privilege. However, MDOC has limited internal controls for assigning access to Offendertrak.

The principle of least privilege means that users should have access to only the permissions and security levels necessary to perform job duties and responsibilities.

Issues with MDOC's lack of internal controls include:

- **User access and permissions are not aligned to job responsibilities and duties:** MDOC inconsistently assigns user permissions and roles for the same job responsibilities and duties. This does not follow the principle of least privilege. During facility visits, prison facility staff reported having more access to the system than necessary to conduct their current job duties. For example, one user has access to move offenders from one facility to another, although that task is not currently a part of the user's job duties and responsibilities.

MDOC does not ensure that users with similar duties and responsibilities have the same access and permissions, e.g., superintendents are assigned varying access to the system.

Additionally, PEER reviewed user roles and permissions for several job titles, including two superintendents at different facilities and seven case managers working at the same facility. The results of the review showed variation in the assigned roles and permissions. For example, of the two superintendents reviewed, one had 23 user

permissions, while the other only had nine permissions. In addition, the seven case managers had a total of 54 user permissions. However, there were only six permissions that were consistent for all seven case managers. Users with the same job titles should have similar permissions.

- **Users are not consistently updated and removed from the system:** MDOC does not properly update user roles and permissions as users change jobs within MDOC or employment is terminated. As a result, there are duplicate accounts and accounts for terminated, retired, and deceased users. For example, one user listed as an active user in Offendertrak has been deceased since 2016.

At least one user listed as an active user in Offendertrak has been deceased since 2016.

Additionally, the list of Offendertrak users provided by MDOC does not accurately provide the current location or job titles for system users. For example, during facility visits, PEER determined that there were at least five users with inaccurate locations and nine users with incorrect job titles. In both examples, the information available was for the users' previous job and facility within MDOC.

PEER determined that these issues occur for the following reasons:

- **Discretion of supervisors:** The responsibility of requesting access is at the discretion of the supervisors. This gives the supervisors the ability to request various user roles and permissions for employees without regard to job title, duties, and responsibilities. Even though MDOC states that it reviews requests, there are no written, standard user roles and permissions based on job titles and responsibilities.

Refer to
Exhibit 4 on
page 13



- **Insufficient user access request form:** MDOC's access request form does not include a box that "removes" access and permissions for a user. The form only "adds" to a user's existing roles. This means that when employees change positions or responsibilities, either within the same facility or when moved to another facility, they are allowed to keep their existing access to the system, along with the updated access needed for the new position or responsibilities.
- **Inadequate removal from the system:** According to MDOC staff, when user accounts are activated in the system, the MIS division will input a future end date for the user, e.g., 2399. This means that user accounts are never technically removed from the system, but will become inactive once the end date on the account passes. However, the MIS division does not always update the end dates on accounts when account access is no longer needed. Due to this, user accounts can stay active in the system for years. This means that a person who is no longer employed by MDOC could access Offendertrak if they had access to MDOC's network.
- **Lack of policies and procedures:** MDOC lacks policies and procedures specifically for removing user access to Offendertrak.

MDOC user accounts can remain active in Offendertrak for years after access is no longer needed.

MDOC's inadequate control over user access and permissions has resulted in duplicate accounts and account errors, which could result in accidental, erroneous, or unauthorized system use. This could affect the security of the information and the reliability and usefulness of the data entered into the system.

During facility visits, prison staff stated that the reliability of MDOC's data in Offendertrak depends on the user responsible for entering information into the system. Staff stated that because MDOC does not limit access to edit data in Offendertrak, there could be some information in the system that has been manipulated by users with excessive access to the system.

How does MDOC manage security and passwords for Offendertrak?

While MDOC is in compliance with *Mississippi's Enterprise Security Policy* and has implemented password requirements for Offendertrak, it could strengthen the security of its data by ensuring users adhere to the password requirements.

To ensure the security of data and information for state agencies, the Mississippi Department of Information Technology Services (ITS) developed the *Mississippi Enterprise Security Policy*. This policy provides standards for state agencies to develop, implement, and maintain their individual agency's information technology security plans. State agencies are required to annually review, revise (as needed), and submit these plans to ITS. In addition, each agency is required to submit

a verification letter with the security plan, acknowledging review and acceptance of the security processes, procedures, and practices.

ITS also requires each agency to obtain an IT security risk assessment from third-party security consultants at least once every three years. While ITS ensures that agencies have submitted security plans and risk assessments, it does not evaluate security plans or provide a review with substantial benefit. As of October 18, 2021, MDOC is in compliance with the requirements of *Mississippi's Enterprise Security Policy*.

As part of the security plan, agencies are required to develop password guidelines for all system users. MDOC has incorporated its password guidelines from the security plan into its policies and procedures, which require all Offendertrak users to:

- be trained in the system's security requirements;
- update passwords on a regular basis; and,
- select passwords that cannot be easily guessed.

During prison facility visits, PEER observed and discussed password requirements with system users. While most users are aware of the password requirements and are required to update passwords anywhere between 30 to 90 days, some users are not adhering to all of MDOC's security requirements. For example, passwords are not always the required length or include the character types listed in the security plan and policy. Further, Offendertrak does not have built-in safeguards and alerts to ensure that passwords meet MDOC's security requirements. Due to the amount of sensitive offender data stored in the system, MDOC could strengthen adherence to its password requirement to ensure the security of its data.

Adherence to strict policies and procedures regarding passwords would strengthen the security of offender data.

Is MDOC's offender data reliable, accurate, and complete?

This chapter includes the results of PEER's records comparison and issues observed during prison facility visits and testing of data in Offendertrak.

This chapter sought to answer the following questions:

- Does offender data in Offendertrak match the source documents in Legato?
- Is MDOC's data related to offender programs reliable, accurate, and complete?
- What other data issues were observed by PEER?

Does offender data in Offendertrak match the source documents in Legato?

In a sample of 100 active MDOC offender records, PEER determined that the data in Offendertrak does not consistently match the source documentation scanned into MDOC's electronic filing cabinet, Legato. As a result, some offender records include incomplete, inconsistent, and missing information.

Refer to discussion beginning on page 1

To determine the reliability, accuracy, and completeness of MDOC's offender data, PEER compared data entered into Offendertrak to the original source documents scanned into Legato, for a sample of 100 active offenders as of April 4, 2022. PEER then used the sample to generalize the results to the entire population of 18,827 active offenders using the Clopper-Pearson binomial method.

MDOC defines an active offender as any offender under its jurisdiction, i.e., an offender whose record has not been closed even if they are not physically in prison or supervised by community corrections (e.g., restitution centers, house arrest).

As shown in Exhibit 5 on page 20 the most common issues include missing documentation, inaccurate offender program data, and low-quality photos, while the least common issues were related to conflicting name data and missing pictures.

Overall, the records comparison revealed several instances of incomplete, missing, and nonmatching offender data for the 100 offenders in the sample. This could make it difficult or impractical for internal stakeholders to use the data in the decision-making process.

Examples of issues identified in the sample include:

- **Missing documentation:** 71 offenders had at least one required document missing from Legato or Offendertrak. MDOC's policies and procedures and state law require offenders to have certain information maintained in their record, e.g., classification documents, risk and needs

assessment, court documents. The following are examples of documentation missing from an offender's record: a signed copy of the program rules and disciplinary policy, a form in Offendertrak enrolling an offender into a program, job, or another assignment, and a signed release of information form. The number of offenders in the entire population missing at least one document could range from an estimated 10,919 (58%) offenders to 15,425 (82%) offenders.

The range of offenders with the issues presented in this section (pages 17 through 19), are statistical projections based on PEER's sample of 100 offenders.

For more
information
see page 21



- **Inaccurate and unreliable offender programming data:** 66 offenders had erroneous or nonmatching program data. The number of offenders in the entire population with program data issues could range from an estimated 9,931 (53%) offenders to 14,623 (78%) offenders.
- **Low quality and poorly scanned photos and documents in the system:** 41 offenders had at least one document that was not properly scanned into Legato, which made comparison to Offendertrak data difficult. MDOC's policies and procedures state that paper documentation should properly be scanned into Legato prior to being destroyed. The number of offenders in the entire population with poorly scanned documents in the system could range from an estimated 5,371 (29%) offenders to 10,232 (54%) offenders.
- **Nonmatching or missing level of education:** 35 offenders had issues with nonmatching or missing highest level of education. An offender's highest level of education helps facility staff determine which programs would be the most beneficial for the offender's rehabilitation and re-entry. The number of offenders in the entire population with this issue could range from an estimated 4,366 (23%) offenders to 9,088 (48%) offenders.
- **Minor issues with offender commitment and sentencing:** 28 offenders had minor issues with the way MDOC entered sentencing information from the documentation into the system (e.g., subtracting county jail time credit from length of sentence instead of entering the credit directly into the system). Issues with offender commitment and sentencing identified in the sample did not affect an offender's time in prison. The number of offenders in the entire population with minor commitment and sentencing issues could range from an estimated 3,243 (17%) offenders to 7,705 (41%) offenders.
- **Sentence computation not verified by second auditor:** PEER determined that 18 offenders did not have their sentence computation audited by a second MDOC auditor. According to MDOC's Sentence Computation Reference Handbook and Records staff, an offender's sentence computation must be audited or verified by an auditor each time a calculation is created or an existing calculation is amended. A reasonable expectation is that the audit of a sentence calculation should be completed by an auditor who was not responsible for entering the initial information (e.g., data from sentencing documents); however, MDOC allows veteran auditors (i.e., individuals with three or more years of experience) to enter and audit the record at the same time. As part of the records comparison, PEER reviewed each offender's sentence computation to determine if the records were audited by an individual who did not enter information into the initial record. The number of offenders in the entire population with sentence computations not verified by a second auditor could range from 1,757 (9%) offenders to 5,616 (30%) offenders.

- Outdated and missing pictures:** 12 offenders in the sample had either an outdated (9) or missing (3) picture in Offendertrak. MDOC's policies and procedures require an offender's picture to be updated every five years. Two offenders in the sample have not had an updated picture since 2014. The number of offenders in the entire population with outdated pictures could range from an estimated 605 (3%) offenders to 3,561 (19%) offenders. The number of offenders in the entire population with missing pictures could range from an estimated 64 (.34%) offenders to 1,986 (11%) offenders.
- Nonmatching SSNs:** 8 offenders had SSNs that did not match between sources. The number of offenders in the entire population with nonmatching SSNs could range from 495 (3%) offenders to 3,315 (18%) offenders.
- Misspelled and incorrect offender names:** 7 offenders had issues with their name, either in Offendertrak or Legato. For example, one of the offenders in the records comparison has a middle name listed in Offendertrak that does not match the sentencing order or criminal disposition scanned into Legato. The number of offenders in the entire population with misspelled or incorrect names could range from 391 (2%) offenders to 3,065 (16%) offenders.

PEER notes that there were several instances in which the description of an offender on the demographics screen did not match the offender's picture.

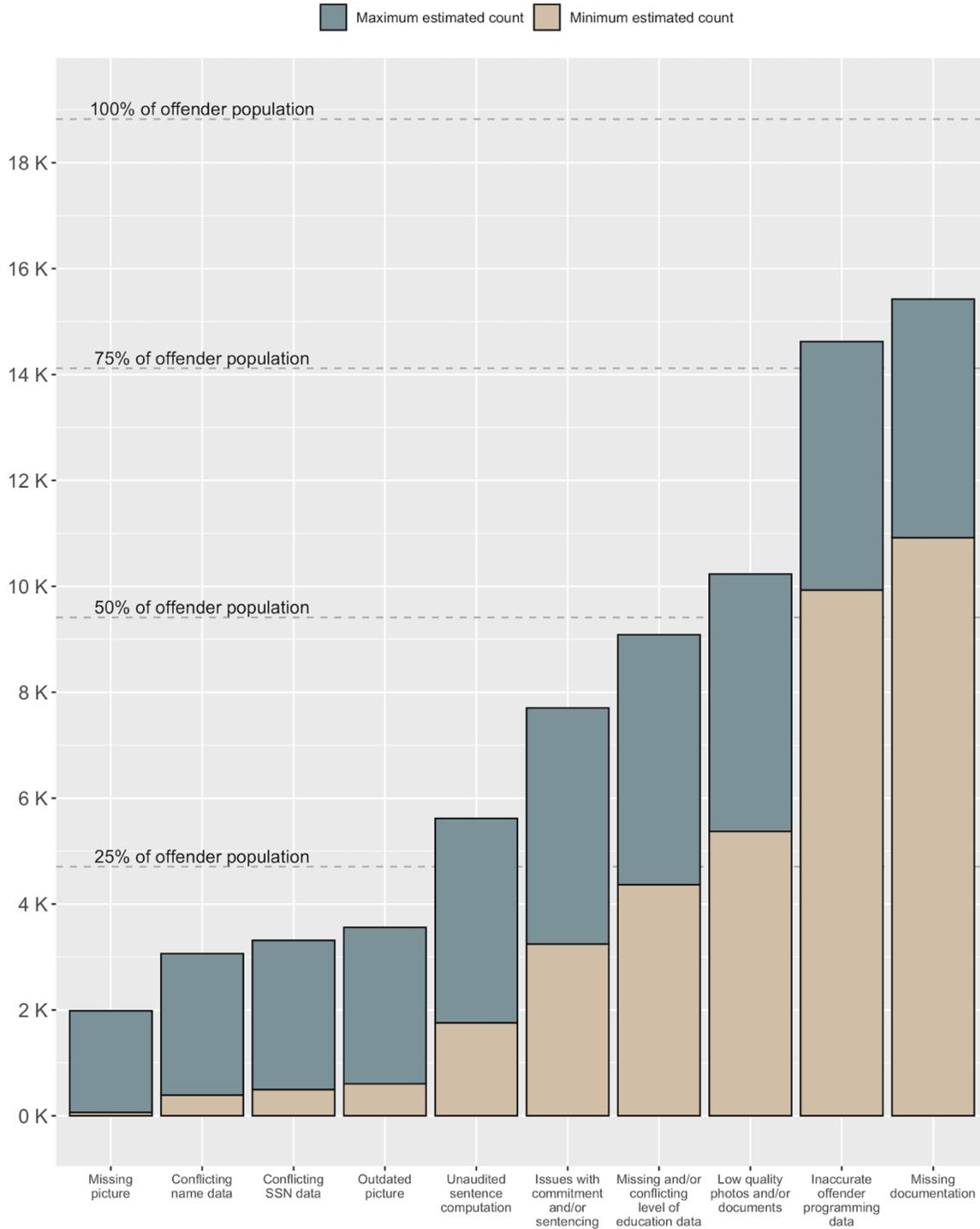
Issues with offender records often occur after the initial record is established by Records staff at the Central Office.

Refer to Exhibit 5 on page 20 for a chart depicting some of the issues identified in the sample of offender records, and the estimated number of the offender population with those issues. PEER notes that issues with offender records often occur after the record is established by Records staff at the Central Office.

Appendix A on page 70 provides a list of all issues observed by PEER during the records comparison for the sample of 100 offenders. Further, **Appendix B on page 74** provides a chart depicting the estimated number of the offender population with issues from the sample.

Exhibit 5: Estimated Count of Offenders with Selected Issues in Offendertrak or Legato

Note: The Clopper-Pearson binomial method produces results with a 99% confidence (or greater, but not less) that the true value of offenders with issues lies within the specified minimum and maximum.



SOURCE: PEER analysis of Offendertrak and Legato data and documentation as of June 1, 2022.

Is MDOC's data related to offender programs reliable, accurate, and complete?

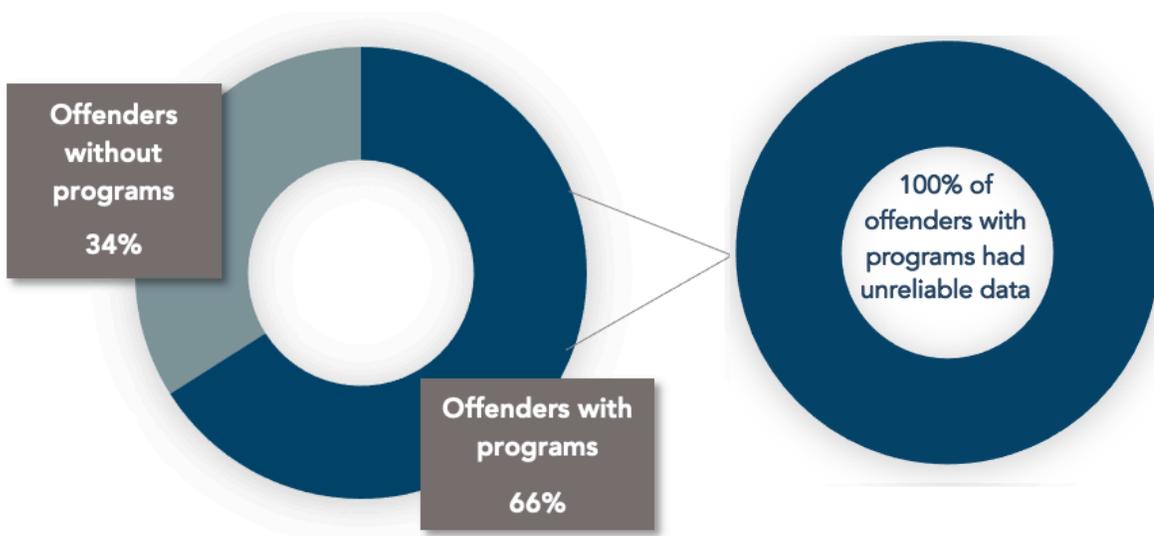
In the sample of 100 active offender records, 66 offenders participated in a program while incarcerated. None of the records for the 66 offenders who participated in a program were complete and accurate in Offendertrak and/or Legato. For example, records included incorrect dates of program completion and missing certificates of completion.

As part of the records comparison, PEER reviewed offender programs, which are provided to offenders during incarceration and encompass a broad range of services and interventions, including:

- alcohol and drug abuse treatment;
- education, i.e., adult basic education (ABE), general education degree (GED), and vocational programming;
- work programs, e.g., prison industries;
- cognitive behavioral therapy; and,
- pre-release/re-entry programs.

Offender program data in Offendertrak is inaccurate, incomplete, and unreliable, and MDOC does not consistently ensure that certificates for program completion are scanned into Legato. This makes it difficult to confirm that an offender participated in programming while incarcerated. Of the 100 offenders included in the records review, 66 offenders participated in at least one program according to the Offendertrak data or a certificate scanned into Legato. Exhibit 6 on page 21 shows that 100% of the offenders that participated in a program had an issue with their program data, in either or both systems.

Exhibit 6: Percentage of Offenders in the Records Comparison with Offender Program Data Issues



SOURCE: PEER analysis of Offendertrak and Legato data and documentation as of June 1, 2022.

Issues with program data included but were not limited to the following:

For more
information
see page 23



- **Incorrect end dates for program completion:** The Inmate Work Program History report in Offendertrak inaccurately reports the end date for program completion.
- **Program certification not scanned in Legato or uploaded to Offendertrak:** Certificates should be scanned into Legato when an offender completes a program. However, not all certificates are scanned into the system. In PEER's sample of 100 offenders, there were approximately 130 programs identified, with 80% of the programs lacking certificates and documentation in Legato. In addition, while not included in the sample, facility staff stated to PEER that one offender who had been in custody for over thirty years did not have any program documentation scanned into the system. Facility staff was unaware of the issues until the offender's family brought it to the facility's attention.
- **Difficult to compare and match program data in the systems:** Even when certificates are scanned into Legato, it is difficult to compare the information to data entered into Offendertrak due to inconsistent program names. For example, one offender had over 12 programs listed in Offendertrak, including several advanced biblical programs. While the offender did have some certificates scanned into Legato, the program names on the certificates were different from the program names listed in Offendertrak, making it difficult to match the records.
- **Missing requests for offenders to attend programs:** According to MDOC staff, offenders should be enrolled in programs using the "staff request" form in Offendertrak. This form is also used to move offenders out of programs once they have completed or been removed from the program (e.g., due to discipline or health condition). However, some offenders have programs listed on the Inmate Work Program History report but do not have a "staff request" enrolling them in and out of the program.
- **Nonmatching program data within Offendertrak:** An offender's program data within Offendertrak will vary depending on the screen. For example, one offender did not have any program information listed on the Inmate Work Program History report. However, the offender had several staff requests enrolling the offender in and out of multiple programs during incarceration. The information within the system should match.
- **Inconsistent use of the system to track offender programs:** While Offendertrak has the capacity to track and maintain offender program information, including program name, facility, enrollment, and max capacity for each program, prison facilities do not consistently enter information into the system. As a result, program information in Offendertrak does not match monthly program reports provided to the Central Office by prison facility staff. These monthly program reports contain issues, including but not limited to inconsistencies in program names, limited program descriptions with some facilities only repeating the name of the program, nonuniform ways of reporting enrollment length and frequency, and missing data in the reports.

While all of the issues combined show that MDOC's program data is inaccurate and unreliable, prison facility staff were most concerned about issues with incorrect end dates on the Inmate Work Program History report. This report presumably shows the facility, program name, begin date, and end date for each program in which an offender has participated. However, PEER determined that the end date on the report is often incorrect. If the offender has changed prisons or has been

released since participating in the program, the end date will reflect the date the change occurred, not the end date for the program.

Exhibit 7 on page 23 provides an example of program information for one offender included in Offendertrak and Legato. The example in the exhibit was pulled from Offendertrak and Legato to depict the differences in offender program data for one individual. Exhibit 7-1 is a screenshot of the offender’s Work Program History Report. According to this report, the offender reportedly completed the program on December 14, 2021, almost six years after beginning the program. However, as shown in Exhibits 7-2 and 7-3, the offender most likely completed the program on July 18, 2016, approximately nine months after the begin date.

Exhibit 7: Example of One Offender’s Issues with Program Information in Offendertrak and Legato

Exhibit 7-1 (Offendertrak)

OFFENDER WORK PROGRAM HISTORY
[06/06/2022]

Inmate Name (Last, First MI): _____ Inmate ID#: _____ Booking ID#: PR-A

Facility	Work Program	Begin Date	End Date
MSP	MSP-THERAPEUTIC COMMUNITY- UNIT 30A	10/08/2015	12/14/2021

Exhibit 7-2 (Offendertrak)

Mississippi Department of Corrections - STAFF REQUEST FOR INMATE RE-CLASSIFICATION

NAME : _____ MDOC# : _____ UNIT : UNIT 30

Current Custody Level : MEDIUM

UNIT TRANSFER FROM 30A _____

UNIT TRANSFER TO 30A _____

INCARCERATION PROGRAM FROM Alcohol & Drugs _____

TO: Common Labor

JUSTIFICATION: Offender completed A&D on 07/18/2016

Exhibit 7-3 (Legato)



SOURCE: PEER analysis of Offendertrak and Legato data and documentation as of June 6, 2022.

According to facility staff, the issue with incorrect program end dates occurs for all offenders participating in programs and then transferring either to a new facility or out of prison altogether.

Due to program issues in Offendertrak, facility staff stated that often they will have to rely on hard copy records (if available) and the offender to verify program participation and completion.

This occurs even if the offender never completed the program. These issues make it difficult for facility staff to know with certainty that an offender has participated and actually completed a program.

What other data issues were observed by PEER?

In addition to data issues identified in the records comparison, PEER observed other issues, including but not limited to a deceased offender in the sample, 745 missing offense dates, and impossible recorded ages (e.g., a two-year-old offender).

The following section provides a brief overview and examples of additional issues PEER observed through interviews, prison facility visits, and review of Offendertrak and Legato.

Outdated Records

In the dataset of active offenders (18,827), PEER determined that 3% (622) of the active offenders were not housed within an MDOC facility or being monitored through community corrections. According to MDOC staff, these offenders still have active records because they have not served their sentence with MDOC, and MDOC has not received documentation to officially close the record. These offenders were listed as:

According to MDOC staff, unless they receive documentation necessary to close an offender's active record, they still consider the offender to be under MDOC's jurisdiction even if the offender is not being housed, monitored, or supervised by MDOC.

- in other custody (483 offenders);
- absconded supervision (78 offenders);
- at-large (25 offenders);
- federal custody (33 offenders);
- N/A (2 offenders); or,
- deported (1 offender).

PEER reviewed this group of offenders and determined the following issues:

- incomplete and outdated records;
- inconsistencies in how MDOC inputs the data into the system; and,
- limited documentation to determine the offender's current location.

At least one offender listed as an active offender in Offendertrak has been deceased since November 2021.

First, through an Internet search, PEER determined that one offender in the sample listed as “other custody” is deceased and has been since November 2021. However, this offender is still listed in Offendertrak as an active offender. The offender’s Legato file does not contain the proper court documents and has not been updated with any information since 2017. PEER determined that this offender has never been in MDOC’s custody.

As of April 4, 2022, there were 161 of the 622 offenders who had been listed in either other custody, other custody – federal, or at-large for at least 10 years or more. Eleven of the 622 offenders have been listed in “other custody” since before 1983. While PEER could only confirm one deceased offender in the data, there is a possibility that even more of the 622 offenders with active records that have not yet served their sentence with MDOC are also deceased.

Additionally, MDOC inconsistently entered information into Offendertrak for this group of offenders. Some at-large offenders are listed as “other custody” offenders, and federal offenders are not always listed as being in federal custody. For example, at least one offender should have been listed as being in federal custody, but MDOC listed the offender’s location as “other custody.”

Finally, these 622 offenders often lack proper documentation in both Offendertrak and Legato to determine their actual location. While MDOC has policies and procedures that establish a protocol for written plans for the investigation and apprehension of escaped offenders, the policies and procedures lack a clear definition of an escaped offender and do not dictate protocol for recording the offender’s escape in Offendertrak or maintaining documentation for escaped offenders in Legato.

According to MDOC staff, MDOC does not list offenders as escaped without proper documentation showing the offender has actually escaped. However, PEER determined that documentation for escaped offenders varies widely. PEER reviewed 10 offenders reported as escaped. Of the 10 offenders, only three had the same documents in Legato.

The data in Offendertrak for “other custody” and escaped offenders can be confusing, inconsistent, and limited. It is difficult to make any conclusions about these offenders by only reviewing Offendertrak. Oftentimes documentation in Legato is also inconclusive and does not help to identify why offenders are listed this way. For example, one offender in PEER’s sample has been listed in “other custody” since 1993. While there is some documentation in Legato showing that the offender did not serve time with MDOC, it is not clear if MDOC has taken steps to find this offender. In addition, this offender is listed in Offendertrak under the wrong name, which could be part of the problem.

Inconsistent Reporting of Escapees

MDOC does not consistently report escapee data in Offendertrak or ensure proper documentation is scanned into Legato. An offender escaped from CMCF custody on February 12, 2022. CMCF staff entered the escape into the system as an incident on February 12, 2022. However, CMCF staff did not enter it into the system or change the offender’s location from “CMCF” to “escape” until February 14, 2022. On the offender’s prior escape in 2018, the incident and escape were entered in on the same day, only a

few hours apart. PEER reviewed two additional offenders who escaped custody on January 4, 2020. Both offenders had updated information in Offendertrak on the date that they escaped. In addition, there were documents in Legato documenting the escapes. However, for the offender escaping custody in 2022, there were no documents reporting the escape.

Issues with Disciplinary and Incident Reports (i.e., Rule Violation Reports)

During facility visits, prison facility staff reported issues with how incidents and disciplinary actions were being reported, stored in the system, and used in the classification process. Because behavior during incarceration is an important factor in classification and reclassification, PEER reviewed disciplinary and incident reports (i.e., Rule Violation Reports [RVR]) for MDOC offenders. Any offender caught violating MDOC's rules and regulations is subject to disciplinary action. The RVR is the form used by prison facility staff to report these incidents and disciplinary actions. The form includes the violation charge, essential facts supporting the alleged violation, processing action taken, findings, and disciplinary action taken. RVRs are used by MDOC to assign an offender to a security level and appropriate facility.

Offender behavior during incarceration is an important factor used to make decisions regarding offenders, including but not limited to housing location, security level, programming, and release. However, PEER determined that MDOC does not ensure the consistency and timeliness of incidents reported by prison facility staff.

PEER reviewed a sample of 25 offender records and found that 13 of the 25 offenders had at least one RVR that had not been entered into both Offendertrak and Legato.

MDOC's policies and procedures regarding an offender's official record are conflicting, confusing, and unclear. In response, staff does not agree on which system should be the source for an offender's official record, leading to inconsistent RVR documentation. For example, PEER reviewed a sample of 25 offender records and found that 13 of the 25 offenders had at least one RVR that had not been entered into both Offendertrak and Legato. In most cases, as reported by facility staff, the RVR will be entered

into Offendertrak but never scanned into Legato. PEER found one instance where MDOC scanned the RVR into Legato, but never entered the information into Offendertrak. In addition, PEER identified one offender with over 70 RVRs, all of which were accounted for in both systems.² PEER notes that it is important for MDOC to consistently enter RVR information either in Offendertrak, Legato, or both systems. If facility staff are not sure which system should be used to report and track behavior, then there could be incidents that are not recorded in either system. Further, RVRs are an important factor in offender classification. However, if it is unclear which system facility staff should use to report RVRs, there could be RVRs not reviewed during the classification process.

² PEER notes that documentation in Legato is not labeled and is often out of booking order. Additionally, PEER reviewed RVRs scanned into Legato as of May 19, 2022, two weeks after MDOC updated the system. This update caused some files in an offender's record to be unavailable and unable to be opened. PEER recognizes that some of these documents that were unviewable could have been RVRs and would affect the analysis conducted.

According to facility staff, RVRs are entered incorrectly or in duplication because there are many people entering information into the system that do not know how to use it. Additionally, some case managers enter an extraordinary occurrence (EOR)³ as an RVR. When this occurs, the offender will often have two records for the same incident, one as an EOR and one as an RVR. This has an impact on an offender's custody level because the more RVRs an offender has the higher the classification score will be.

PEER reviewed RVRs for a sample of offenders and determined that hearings were conducted in a timely manner in only 68% of the cases. Of those hearings, only 60% were input into Offendertrak in a timely manner.

Moreover, facilities do not input RVR information into the system in a timely and efficient manner. Per MDOC policy, RVR hearings should be conducted and recorded in Offendertrak within seven days of the reported incident. PEER reviewed RVRs for a sample of 100 offenders and determined that hearings were conducted in a timely manner in only 68% of the cases. Only 60% of those hearings were input into Offendertrak in a timely manner.

Incomplete Records

In the sample of 100 offenders, one offender did not have all sentences imported into Offendertrak from the previous data system in 2002. According to the offender's court documents in Legato, Offendertrak should show five sentences, but instead, Offendertrak shows only three sentences for the offender. PEER notes that the offender is currently serving a life sentence; therefore, the remaining two sentences do not affect the offender's sentence computation (i.e., parole eligibility and release dates). According to MDOC staff, this is a result of MDOC's previous system not maintaining more than three sentences for offenders. During conversion to Offendertrak, MDOC staff ensured the additional sentences were entered into a separate section of the system but did not ensure they were subsequently added to the sentence computation screen. MDOC staff stated that this issue would have been resolved if the record had been updated by MDOC staff in Offendertrak after conversion.

Due to this issue identified in the sample, PEER reviewed sentencing data for all active offenders and determined there were 745 records without offense dates. According to MDOC, these records have not been updated in Offendertrak since being input into the system.

Issues with Inaccurate Keep-Separates in Offendertrak

A "keep-separate" is a notice that certain offenders should not be housed in the same building. For example, if an offender is scared of another offender, or if two offenders have been known to fight with one another, they should not be housed together. The keep-separate data in Offendertrak allows MDOC to

Offendertrak produces an inaccurate list of keep-separates for offenders during mass movement.

³ An EOR is an event that occurs at an MDOC facility which is outside of normal operations and would not count as disciplinary action against the offender (e.g., an offender causing harm to him or herself and requiring medical attention).

maintain this information for each offender. However, during prison facility visits, facility staff expressed concern regarding inaccurate keep-separate data in Offendertrak during mass movement (e.g., moving multiple offenders at the same time in the system) of offenders. According to facility staff, Offendertrak will produce a long list of keep-separates during mass movement. This list is meant to make it easier for staff to move offenders from one facility to the next and ensure offender and prison safety. However, the list produced by the system includes duplicate offender names and offenders no longer incarcerated. Additionally, the system often produces a list of the same individuals, even if the individuals are not located at the new facility.

For example, at one facility the movement planning screen in Offendertrak showed 47 keep-separates for one offender. However, when facility staff checked the offender's keep-separate screen in Offendertrak, the offender only had one keep-separate listed.

PEER compared keep-separate documentation provided by two facilities and determined the following:

- There were 29 offenders that appeared as keep-separates on both lists.
- Of those 29 offenders, 15 were no longer in an MDOC facility, with three offenders located out of state.
- There were 12 offenders duplicated on the same keep-separate list, with six offenders appearing on the same list three or more times.

Unclear and Erroneous Offendertrak Reports and Forms

Some Offendertrak reports provide erroneous information. For example, a report of incidents make it appear as if incidents are occurring at facilities when they are not. PEER determined that instead of reporting location of incidents, the reports show an offender's current facility location.

Offendertrak uses data stored within the system to compile over 700 reports. However, prison facility staff only use approximately 50 of the reports produced by the system to assist with their job responsibilities and duties.

According to prison facility staff, reports in Offendertrak do not always provide accurate information, and staff is required to verify the information generated by the reports to ensure they are using the most accurate data to make decisions.

The following are examples of the most common issues reported by the facilities.

- **Erroneous incident locations:** Offendertrak produces reports that show incidents occurring at a facility when the incidents occurred somewhere else. For example, MDOC is required to maintain and investigate all incidents of alleged sexual assault, as required by the Prison Rape Elimination Act (PREA) of 2003.⁴ The PREA report in Offendertrak provides a list of all offenders who have an open PREA form that has not been finalized. The report includes the facility where the incident presumably occurred. However, the report actually shows the facility where the

⁴ The purpose of PREA is to "provide for the analysis of incidence and effects of prison rape in federal, state, and local institutions and to provide information, resources, recommendations, and funding to protect individuals from prison rape."

offender is located at the time the report is run in Offendertrak. According to facility staff, this makes it appear as if these incidents have occurred at their facility when they have actually occurred somewhere else. Multiple other report forms created in Offendertrak have the same issue. PEER reviewed PREA forms for 12 offenders and determined that the reported incidents for 10 out of the 12 offenders occurred at a different facility than listed on the report. The two offenders that had the correct location had not moved facilities since the incidents occurred.

- **Missing offender assignments:** If an offender is assigned to more than one job or program, one of the reports in Offendertrak will only show one of the assignments instead of both.
- **Incorrect incarceration programs or housing units:** Reports list offenders in incarceration programs or housing units that the facility does not have or operate.

Further, Offendertrak reports do not load in a timely manner, which can interrupt workflow and add unnecessary burden to prison facility staff and other system users. During the course of the review, PEER had trouble opening reports in Offendertrak, including days when reports would not open at all.

During the course of the review, PEER observed days in which Offendertrak reports would take hours to open, including days when reports would not open at all.

In addition to issues with reports, PEER also observed issues with the forms in Offendertrak used by facility staff to report data for offenders. Examples of issues with forms include but are not limited to:

- blank sheets;
- duplicates;
- unsigned;
- no place to list facility other than the comments;
- difficult to print; and,
- unable to see all of the information in the form.

PEER also notes that some information is not uploaded to Offendertrak in a timely manner. For example, one incident occurred more than three years before facility staff completed a form in the system.

Impossible Recorded Ages and Release Date

At least two offenders in the dataset provided by MDOC had impossible recorded ages, making one offender two years old and another offender four years old when the crimes were committed. Both of these instances have since been fixed by MDOC and were most likely caught and revised during the initial classification process.

While the record has since been updated, MDOC's original data provided to PEER showed an offender as being two years old.

Additionally, one offender in the review had an impossible Earned Release Supervision date. The offender committed the crime in 2007. However, the system calculated his Earned Release Supervision date for 1954. This instance has been overridden by MDOC to reflect the correct date.

System Errors in Sentence Computation when Updating Some Offender Records

According to Records staff, sentence computation issues occur in Offendertrak when staff make changes to some offenders, especially when entering earned time. As a result, there could be hundreds of offenders with incorrect release dates.

Pursuant to MDOC's policies and procedures, incarcerated offenders are allowed to receive earned time, i.e., time awarded or an allowance given to an offender as a reduction in sentence. The most common examples of earned time are Trusty Earned Time (TET)⁵ and Meritorious

Earned Time (MET).⁶ According to Records staff, sentence computation issues occur in Offendertrak when staff makes changes to some offender records, especially when entering earned time. This causes some offenders' release dates to be incorrect. If the issues are noticed, Records will override the system. According to Records staff, there could be hundreds of offenders with incorrect release dates. However, staff does make an effort to ensure that any issues are caught as quickly as possible. Records staff will flag offenders with problems as "update-only" for sentence computation. As of May 23, 2022, there were 1,228 offenders with an "update-only" flag for sentence computation. MDOC staff stated that an "update-only" flag can be applied for various reasons and does not necessarily correspond to an error in computation. PEER reviewed a sample of 100 offenders in the "update-only" data and determined that 92 of the offenders had their sentence computation overridden to correct a system calculation error.

Issues with Dropdown Boxes in Offendertrak

When operating a database system, such as Offendertrak, human errors can occur. System controls help to minimize those errors. A dropdown box, i.e., a pre-populated list of information, is an example of a system control that helps limit data entry and the occurrence of errors. While Offendertrak has dropdown boxes for many of their data fields, PEER determined that some of these dropdown boxes contain:

A dropdown box is a pre-populated list of information. This represents a system control that limits data entry and prevents the occurrence of errors. However, MDOC's dropdown boxes in Offendertrak include out-of-date information and similar options, which could lead to inconsistent and inaccurate data.

- **Out-of-date information:** In the data provided by MDOC, several of the offenders were listed under security levels that are no longer being used.

⁵ Offenders classified in trusty status and enrolled and participating in an approved program or job may earn a reduction of their sentence, i.e., a 30-day reduction off their sentence for every 30 days of participation in an approved program.

⁶ MET is an additional incentive used by MDOC that deducts time from an offender's sentence for program participation and institutional work.

- **Similar options:** On the demographics screen, for hair type, the dropdown box has over 32 options, including similar options, such as bald, balding, and balding on the crown.

Facility staff reported that they often have to contact MDOC's MIS staff on a regular basis to add locations, such as hospitals, to the dropdown boxes. When the information is not available in the dropdown boxes, Offendertrak will list the incorrect location for offenders. Facility staff stated that it could take days for the information to be added into the system.

What is the impact of MDOC's unreliable offender data?

While there are many stakeholders that utilize offender data to make decisions, PEER focused this review on the impact unreliable data could have on the Legislature, MDOC, and offenders. Further, PEER notes that while there are other criminal justice entities (e.g., local courts) responsible for providing corrections data to inform decisions, this review focuses only on data provided by MDOC.

This chapter sought to answer the following questions:

- How could unreliable data impact the Legislature's decisions regarding the state's correctional system?
- How could unreliable data impact MDOC's decisions regarding operations, administration, and offender management and supervision?
- How could unreliable data impact offenders?

How could unreliable data impact the Legislature's decisions regarding the state's correctional system?

PEER identified several instances in which MDOC has published inaccurate reports to its website and provided incorrect information in response to legislative requests (e.g., population counts by facility). As a result, the Legislature might not effectively use MDOC's data to make the most informed decisions regarding policy and the funding of the state's correctional system.

According to the National Conference of State Legislatures' (NCSL) report, *Policymaker's Use of Data to Inform Criminal Justice Decisions*, Legislators depend on access to reliable, consumable, and comparable data to inform a wide range of budget and policy decisions. As it relates to criminal justice efforts, the Legislature uses corrections data to inform decisions and improve state policies related to but not limited to:

- sentencing laws;
- corrections and supervision practices;
- offender programming;
- population trends; and,
- overall operational costs of MDOC.

However, if the Legislature is provided unreliable and outdated data, it might not make the most efficient and effective decisions. PEER identified several instances where MDOC has published and provided incorrect data that could have an impact on the Legislature's decisions. While the Legislature should be able to use the information provided by MDOC to make decisions, the

issues and errors identified throughout this review suggest MDOC does not always provide the most accurate data needed to make the most informed decisions. PEER notes that the Legislature and other stakeholders are most likely not aware of the issues and errors in reports provided by MDOC, especially ones published to MDOC’s website. As a result, policymakers could be using MDOC’s data to inform decisions without realizing the lack of data integrity.

The following section provides a brief overview and examples of errors in data provided by MDOC that could have an impact on legislative decision-making regarding the state’s correctional system.

Issues with Monthly Fact Sheets Published to MDOC’s Website

MDOC publishes monthly fact sheets on its website each month. According to MDOC staff, this report is produced by Offendertrak and provides monthly offender population counts and other offender population statistics.

MDOC publishes data to its website that contains errors and inconsistencies.

Incorrect Offender Population Counts and Percentages by Facility Type

Exhibit 8 on page 33 provides an example of incorrect offender population counts and percentages by facility type (e.g., private prisons). As shown in the exhibit, MDOC erroneously reported that 10,468 offenders were housed in private prisons in October 2020. However, as shown in the blue boxes directly below MDOC’s reported totals, the actual number of offenders in private prisons during that month totaled 3,518. Instead of 40%, private prisons only comprise 13.54% of the offender population. This is an important distinction because the Legislature funds private prisons based on an authorized bed count.⁷ PEER notes that this issue occurs often in MDOC’s monthly fact sheet, and as of June 8, 2022, MDOC has not corrected the report on its website.

Exhibit 8: Example of Incorrect Offender Population Counts and Percentages by Facility Type in MDOC’s Monthly Fact Sheet

<i>Monthly Fact Sheet – October 2020</i>	Capacity	# of Offenders	% of Total Offenders
Private Prisons			
East MS Correctional Facility	1,500	1,208	4.65%
Marshall County Correctional Facility	1,000	966	3.72%
Tallahatchie Correctional Facility	1,000	489	1.88%
Wilkinson County Correctional Facility	1,000	855	3.29%
TOTAL PRIVATE PRISONS	12,229	10,468	40.30%
Actual Totals →	4,500	3,518	13.54%

SOURCE: MDOC monthly fact sheet for October 2020, obtained on June 8, 2022.

Nonmatching Offender Totals within the Same Report

Exhibit 9 on page 34 provides an example of nonmatching offender totals within the same report. For example, in the monthly fact sheet for May 2022, MDOC

⁷ In its budget request for FY 2023, MDOC reported an authorized prison bed count of 5,675.

reported three different offender totals. As shown in the exhibit, MDOC reported an offender total of:

- 19,054 on the first page;
- 23,093 at the top of the second page; and,
- 18,319 at the bottom of the second page.

Offender population counts are an important statistic used by the Legislature to make decisions regarding corrections policy, and the Legislature should be able to rely on MDOC to report the correct number of offenders in custody. Moreover, if MDOC cannot accurately report offender population, the Legislature could question the accuracy of other data it provides. Further, this impacts the accountability and transparency of MDOC.

Exhibit 9: Example of Nonmatching Offender Totals within the Same Monthly Fact Sheet

The totals in the boxes should all equal the same number of offenders.

Page 1 of the Monthly Fact Sheet – May 2022

	NO. OF OFFENDERS	% OF TOTAL OFFENDERS
INMATES		
Custody Population (Inmate, RRP status, Contempt)	17,088	31.46%
Community Corrections (ERS, ISP, Medical Release, Conditional Release, Failure to Report)	1,434	2.64%
Other Custody	499	.92%
At Large (Escapeses & Walk-Aways)	23	.04%
Off-Grounds Medical (Hospital)	10	.02%
INMATE TOTAL	19,054	35.08%

Page 2 of the Monthly Fact Sheet – May 2022

	20,136	21,118	19.03%
TOTAL CAPACITY & CUSTODY POPULATION			
Intensive Supervision Program	-	1,015	4.40%
Conditional Release	-	3	0.01%
Earned Release Supervision Program	-	405	1.75%
Failure to Register-Monitoring	-	5	0.02%
Medical Release	-	15	0.06%
TOTAL COMMUNITY CORRECTIONS	0	1,443	6.25%
Other Custody	-	499	2.16%
Off-Grounds Medical (Hospital)	-	10	0.04%
At Large (Escapeses & Walk-Aways)	-	23	0.10%
TOTAL	20,136	23,093	100.00%

BY RACE/SEX AND LOCATION

RACE	MALE	% OF TOTAL MALE POPULATION		% OF TOTAL FEMALE POPULATION		NO. OF OFFENDERS	% OF TOTAL OFFENDERS
		MALE	FEMALE	MALE	FEMALE		
Black	10,344	61.64%	553	35.93%	10,897	59.48%	
White	6,164	36.73%	962	62.51%	7,126	38.90%	
Hispanic	201	1.20%	14	.91%	215	1.17%	
Native American	27	.16%	7	.45%	34	.19%	
Asian	37	.22%	3	.19%	40	.22%	
Data Unavailable	7	.04%	0	.00%	7	.04%	
TOTAL	16,780	100.00%	1,539	100.00%	18,319	100.00%	

SOURCE: MDOC monthly fact sheet for May 2022.

As discussed
on page 25



Deceased Offender

MDOC's active offender data includes at least one deceased offender. Subsequently, the offender is included in the total for "other custody" offenders and the overall offender total each month. MDOC does not provide any information regarding "other custody" offenders. Individuals unfamiliar with MDOC's data would not be able to determine what type of offenders are included in the "other custody" category and would have no way of knowing that at least one of the offenders in the "other custody" category is deceased.

Participation Counts and Recidivism Rates for Offender Programs

The Legislature has made an effort to shift MDOC resources to programs proven to be effective in reducing recidivism (e.g., Thinking for a Change, a cognitive behavioral therapy program).

The Legislature often uses recidivism to assess how well MDOC is performing in regard to rehabilitating the state's offenders and improving the safety of the state's citizens.

PEER notes that MDOC struggles to provide reliable participation data, which is essential to understanding the effectiveness of offender programs and reporting recidivism rates. On several occasions, PEER has forgone using program participation data provided by MDOC due to:

- a lack of uniformity in how prison facilities report participant counts (e.g., some facilities provide a range of offender participants instead of an actual count);
- missing data; and,
- timeliness and lack of response from MDOC and all facilities.

MDOC does not require prison facility staff to report offender program information and participation counts in Offendertrak, which should be used as a centralized reporting system to help track program participation.

Due to erroneous offender program data, MDOC cannot accurately report recidivism rates for program participants. However, in its budget request, MDOC annually reports

MDOC's programs could be effective in reducing recidivism, but its data is too unreliable to confirm this with certainty.

recidivism rates to the Legislature. In its FY 2023 budget request, MDOC reported a recidivism rate of 12.1% for offenders completing vocational education at CMCF. Given the erroneous and missing data in the system, this statistic inaccurately portrays the effect MDOC's programs

have on offenders.

COVID-19 Data

To provide the Legislature with information regarding MDOC's effort to mitigate COVID-19 within the state's prison system, PEER released *Issue Brief #671: A Review of the Mississippi Department of Corrections's Response to the COVID-19 Virus and Use of Federal Funds* on August 16, 2022. In PEER's request for COVID-19

Exhibit 10 on page 36 illustrates inaccurate data regarding positive cases of COVID-19 in MDOC facilities.

data, MDOC provided a 900% vaccination rate, which is inaccurate and implausible. As shown in Exhibit 10 on page 36, MDOC also reported a cumulative total decrease from one month to the next. In one month, MDOC reported that Leake County Correctional Facility had a cumulative total of 74 confirmed COVID-19 cases. However, in the next month, MDOC reported that the cumulative total decreased by 64 cases for a new cumulative total of 10 COVID-19 cases. PEER notes that cumulative totals will not decrease from one month to the next, and this information provides an inaccurate picture of MDOC’s cumulative positive cases by facility.

Further, as discussed in the issue brief, PEER could not confirm the total number of offenders in MDOC custody who have died from COVID-19 or due to complications from the virus. Although COVID-19 data is not captured in Offendertrak because medical data is maintained in a separate system, this information is still part of an offender’s record and can impact decision-making.

Exhibit 10: MDOC’s Confirmed Cumulative Positive COVID-19 Cases

Cumulative totals will not decrease from one month to the next.

Regional Facility	Cumulative Positive Cases as of:	
	April 5, 2022	May 3, 2022
Kemper-Neshoba County Correctional Facility	2	1
Leake County Correctional Facility	74	10

Data obtained from MDOC’s COVID-19 Confirmed Offender Cases report for April and May of 2022.

SOURCE: Data provided by MDOC as of May 5, 2022.

Offender Population Counts by Facility

In response to a previous request from PEER for prison population totals from FY 2016 to FY 2020, MDOC provided offender counts that did not match data presented on MDOC’s website. For one facility, Mississippi State Penitentiary (MSP), MDOC provided counts two times more than the number of offenders actually in the facility at the time. Legislators familiar with MDOC’s data and total prison population expressed concerns regarding the count reported by MDOC. As a result, PEER determined that prison population counts reported by MDOC often do not match among various sources, e.g., Offendertrak and reports published on MDOC’s website. PEER notes that while this could be due to a timing issue, MDOC should still conduct due diligence to ensure that prison counts are accurate and consistently reported.

Offendertrak User Roles and Permissions

As part of this review, PEER requested a list of all Offendertrak users, including entity name, job title, and user role/security level. Initially, MDOC provided PEER with a list of users (a

total of 1,040 as of February 1, 2022). However, upon review, PEER determined that the data did not include all users; the list excluded all staff at the Central Office and the Commissioner. MDOC staff stated that the list provided to PEER excluded some users due to an error in the computer code used to compile the list. MDOC resubmitted the list of users with a new total of 1,337 users. However, MDOC staff stated that instead of sending PEER a list of all user accounts in the system, the list provided only included users that had actively logged into the system in the past four months. PEER used an Offendertrak report for active staff to determine there were 3,334 active user accounts in the system as of March 1, 2022.

How could unreliable data impact MDOC’s decisions regarding operations, administration, and offender management and supervision?

Unreliable data could make it difficult for MDOC and prison facility staff to ensure the most effective and efficient decisions are being made regarding the management of offenders and operations of facilities. In addition, unreliable data adds unnecessary burden and stress to prison facility staff, which increases inefficiency. In order to make the best decisions regarding offenders, staff must sometimes independently verify the accuracy of reports and information contained in Offendertrak.

Various levels of MDOC staff use offender data to make decisions including:

Refer to
Exhibit 3 on
page 11



- administration at the Central Office;
- prison facility managers;
- unit managers; and,
- case managers and other staff responsible for managing offenders (e.g., housing, security, transportation, program assignments).

The Parole Board also relies on offender data to make decisions regarding parole (e.g., offenses, disciplinary history, program participation).

The next section discusses how MDOC’s data issues impact:

- MDOC’s efforts to improve offender behavior and remove gangs in prison;
- prison facility staff workload; and,
- prison facility management and supervision.

Impact on MDOC’s Effort to Improve Offender Behavior and Remove Gangs in Prison

Offender programs are provided during incarceration to improve behavior and teach tangible skills that will allow offenders to obtain employment and be successful upon release from prison. According to the National Institute of Justice, offender programs are not only intended to enhance public safety by lowering recidivism (percentage of offenders re-

While improving behavior and removing gangs in prison is a priority for MDOC, unreliable data, such as with offender programs, limits the effectiveness and efficiency of rehabilitation and re-entry decisions made by MDOC.

incarcerated within 36 months of initial release), but also promote greater safety within prisons by reducing misconduct.

Refer to
discussion on
page 21



Improving behavior and removing gangs in prison is a priority for MDOC's current Commissioner, who has been with MDOC since May 2020. The Commissioner has noted on multiple occasions the importance of the rehabilitation of Mississippi's prison system by focusing on moral rehabilitation and re-entry for all offenders. However, MDOC does not accurately and consistently track offender programs or ensure that offenders are provided certificates of completion. Effective and efficient monitoring of offender programs during incarceration is essential to successful rehabilitation and re-entry.

In addition to issues with reliable program data, MDOC has issues with prison facilities properly and consistently reporting RVRs in Offendertrak. While MDOC's policies and procedures provide a list of categories for rule violations, prison facility staff stated that disciplinary action is at the discretion of the superintendent, warden, and facility. For example, one superintendent stated that he noticed one facility had ranked an incident as a C7 (i.e., possession of major contraband), which is a major violation and could result in loss of time and privileges for the offender.⁸ The Superintendent said that he would have ranked the incident as a less serious violation.

The Commissioner and MDOC cannot ensure that the right decisions are being made regarding offender behavior and rehabilitation if the data is not accurate, consistent, complete, and timely.

Impact on Prison Facility Staff

Offendertrak produces over 700 types of reports. However, only a small portion of these reports (approximately 50) are used by prison facility staff to assist with their job responsibilities and duties, including but not limited to:

- physical counts;
- initial classification and reclassification;
- offender programs;
- preparation of parole dockets; and,
- offender transfers and movements.

PEER notes that unreliable data has a significant impact on prison facility staff by adding a burden to an already heavy workload. Due to issues with reports and information produced by Offendertrak, facility staff is required to review every report produced by the system and verify data by checking each offender's information separately. Facility staff stated that these extra steps are stressful and time-consuming, and could lead to bigger issues. For example, during mass movement of offenders from one location to another, facility staff are required to review each individual offender to verify any keep-separates listed on the mass movement screen. If a facility is moving over 100 offenders, this could take hours to verify.

Refer to
discussion on
page 29



⁸ RVRs are classified based on severity of the violation. Minor violations are categorized as "A," serious violations are classified as "B," and major violations are classified as "C."

Facility staff also expressed concerns about reports submitted to the Central Office showing inaccurate instances of violence that appear on the report for their facility. Facility leadership told PEER that they will use a pen to mark out the incorrect information on the report manually before submitting it to the Central Office. The issues with unreliable data have caused facility staff to rely on hard copy records (e.g., tally sheets), and some staff even stated that they trust their hard copy records more than the information available in the system. Exhibit 11 on page 39 provides an example of handwritten records kept by facility staff. The example shows a tally sheet for changes made to custody level during reclassification of offenders housed at one facility. Prisons are required to submit this information to the Central Office each month. Offendertrak should be able to accurately and consistently maintain this information, without staff relying on handwritten records.

Exhibit 11: Example of Handwritten Records Kept by Prison Facility Staff

March

<p><u>Remain Same</u></p> <p> - </p> <p> </p> <p> </p> <p> </p> <p> </p> <p> </p>		<p><u>S/P</u></p> <p> </p> <p><u>T/E/T</u></p> <p><u>Removed</u></p> <p><u>T/E/T</u></p> <p> </p>
<p><u>Overrides / Remain Same</u></p> <p> - </p> <p> </p> <p> </p> <p> </p> <p> </p>		
<p><u>Min-Non / Upgrade</u></p> <p> <u>downgrade</u></p> <p> </p>	<p><u>Min-Com / Upgrade</u></p> <p> </p>	
<p><u>Downgrade / Med</u></p> <p> </p>	<p><u>Downgrade / Close</u></p> <p> </p> <p> </p>	<p><u>Upgrade / Med</u></p> <p>✓</p>

SOURCE: Prison facility staff.

During the course of the review, PEER determined that MDOC's Central Office staff often rely on prison facility staff to provide offender information in the form of monthly reports, instead of accessing Offendertrak to obtain the information themselves. Prison facility staff do not always report the information provided to the Central Office in the same way. This impacts the overall integrity of the data used and reported by the Central Office to make decisions.

Impact on Prison Facility Management and Supervision

Offender classification guides many aspects of offender processing and is dependent upon the quality and timeliness of data. Improper classification of offenders affects the security of prisons, and could result in offender riots, poor prison conditions, deaths, and escapes.

Prison facility staff use offender data to make decisions regarding the supervision and management of offenders. Unreliable offender data makes it difficult to effectively and efficiently manage offenders. One of the most important decisions made by prison facility staff using data is the classification of offenders.

Offender classification establishes an offender's custody level (i.e., minimum, medium, close), including facility assignment, program eligibility, and supervision requirements. It is essential in guiding decision-making for many aspects of prison facility management and offender processing and is dependent upon the quality and timeliness of data. Proper offender classification ensures:

- the safety and security of offenders, prison facility staff, and the public;
- the effective and efficient operation of prison facilities; and,
- the proper and humane care of offenders during incarceration.

There are many factors that MDOC prison facility staff consider before assigning an offender to a custody level, including but not limited to:

- nature of offense (e.g., circumstances and type of crime committed);
- sentencing data (e.g., type and length of sentence);
- prior criminal history (e.g., nature and pattern of past offenses);
- personal and social factors (e.g., age, family, employment and work skills, mental and physical health); and,
- behavior during incarceration (e.g., disciplinary and incident reports).

All MDOC offenders are initially classified at the Reception and Classification Center at CMCF and then reclassified at least every 12 months to assess the appropriateness of the offender's classification plan. Offendertrak is used to store an offender's classification data and calculates a classification score and custody level based on information entered into the system by MDOC on the classification form. Offendertrak lacks automation, therefore, the information has to be entered on the form and is not automatically pulled from data maintained in the system. According to MDOC staff, if an offender scores:

- 4 points or less, the security level is "minimum";

- 5 to 10 points, the security level is “medium”; and,
- 11 or more points, the security level is “close.”

An offender’s incident and disciplinary history is an important part of offender classification and reclassification. However, due to the discretion given to prison facilities regarding offender behavior and the issues it has with incident and disciplinary data in Offendertrak, MDOC cannot be certain that they are making the most informed classification and reclassification decisions. Per MDOC policy, in conducting offenders’ reclassification, case managers review RVR and incident history and assign the offender a custody level based on the point system. However, if the information has not been entered into the system properly and in a timely manner, facility staff cannot ensure they are making the most informed decisions.

Issues documenting behavioral incidents and mental and physical health issues could lead to improper classification of offenders. Improper classification affects the security of a prison and could lead to:

- offender riots;
- poor prison conditions;
- deaths; and,
- escapes.

For example, an offender escaped from MDOC custody at CMCF on February 12, 2022. MDOC reclassified the offender in November 2021, changing the offender’s security level from “close” custody to “medium” custody. However, the offender’s reclassification score and history of escapes should have prevented MDOC staff from changing the offender’s custody level without additional approval.

Proper classification allows prison facilities to more effectively and efficiently operate by supporting resource allocation, staff assignments, and planning for additional space needed for housing locations and options.

According to the NIC, the proper classification of offenders is key to ensuring fiscal efficiency and avoiding a waste of prison resources. Proper classification allows prison facilities to more effectively and efficiently operate by supporting resource allocation and staff assignments and planning for

additional space needed for housing locations and options. Moreover, reliable classification data assists MDOC and prison facilities in the management, planning, monitoring, and operations to ensure effective decision-making at all levels.

How could unreliable data impact offenders?

Unreliable data could have the greatest impact on the offenders MDOC is required to care for and rehabilitate. For example, inaccurate data could lead to offenders who are improperly classified, housed in an inappropriate or dangerous location, incarcerated beyond their release date, not earning credit for programming, and unable to effectively re-enter society upon release.

MDOC is legally responsible for providing for the care, custody, and treatment of offenders under its jurisdiction. As part of its responsibility, MDOC is required to maintain data and records for these offenders. MDOC's unreliable data could have the greatest impact on the offenders it is required to care for and rehabilitate. Issues with data could cause confusion amongst staff and result in offenders who are:

- improperly classified (e.g., not placed in the least restrictive security level);
- unsafe (e.g., housed in an inappropriate or dangerous location);
- in prison beyond their actual release date;
- released before their actual release date;
- not provided proper medical attention;
- not earning credit for programming; and,
- unable to obtain employment upon release.

While there are many ways that unreliable data impacts offenders, PEER focused this review on how MDOC's data issues could affect an offender's:

- rehabilitation and successful re-entry to society;
- participation in programs and ability to obtain employment upon release; and,
- sentence computation.

Impact on Offender Rehabilitation and Re-entry

Unreliable offender data related to classification can result in some offenders being placed in more restrictive housing and denied their basic needs during incarceration. This can result in offenders having difficulty re-entering society.

In most cases, the purpose of incarceration is to rehabilitate offenders and ensure their successful re-entry into society. Because classification guides many aspects of incarceration and offender management, the improper classification of offenders can have a lasting impact on individuals long after their incarceration is over. According to the NIC, as it relates to the impact on offenders, the goal of classification should be to ensure that risk and needs are evaluated to:

- identify violent offenders and adequately separate these offenders from potential victims;
- provide the least restrictive housing environment;
- identify appropriate programs and treatment to support rehabilitation and re-entry;
- ensure appropriate mental health and medical needs are provided for during incarceration; and,
- support equity, fairness, and consistency among offenders.

On April 20, 2022, the United States Department of Justice released a report on its investigation of the Mississippi State Penitentiary (MSP) located in Parchman, Mississippi. As reported by the Department of Justice, MSP implements facility-wide lockdowns for all

offenders in the prison, regardless of classification status or disciplinary history. These lockdowns can last for months at a time and have created conditions amounting to restrictive housing throughout the entire facility. According to the report, the facility houses hundreds of offenders in restrictive housing on a daily basis, with many of the offenders being held for an average of 515 days. Some offenders are even held in restrictive housing for several years. In addition, offenders in restrictive housing at the facility are:

- not provided access to showers or outside recreation;
- required to endure egregious environmental conditions;
- denied access to adequate medical and mental health care; and,
- deprived of human interaction.

This has compounded the substantial risk of serious harm and psychological deterioration for offenders, including repeated incidents of self-harm and suicide. If offenders are subject to these types of conditions while incarcerated, re-entry efforts will be more difficult and the likelihood of offenders returning to prison will increase.

Reliable offender data and proper classification can help provide effective rehabilitation and ensure that offenders can lead law-abiding and self-supporting lives upon release to society.

Impact on Offender Programming and Employment

Offenders do not have an accurate history of program participation. This not only impacts an offender's time in prison but can also cause problems for an offender upon release (e.g., obtaining employment).

Unreliable offender program data not only impacts an offender's time in prison but can also cause problems for an offender upon release. While incarcerated, issues with offender programs could result in offenders not earning a reduction in their sentence for program participation. As discussed on page 30, MDOC's policies and procedures

allow offenders to receive earned time, such as TET and/or MET, for participating in programs while incarcerated. For example, prison facility staff stated that one offender had been in MDOC's custody for over 30 years but had not earned any time in Offendertrak for completing programs, which is highly unlikely. The offender also had no documentation in Legato supporting program participation. The facility only became aware of the situation because the offender's family reported the issue and were able to provide all of the certificates the offender had earned over the 30 years. According to facility staff, if the offender had not kept the certificates proving program participation, the facility would not have been able to add the earned time credit into the system.

In addition, because offenders often transfer from one facility to another during incarceration, not accurately maintaining program information in Offendertrak makes it difficult for facilities to know in what programs offenders have participated or should participate. This could result in offenders not obtaining the programs and treatment needed to support successful re-entry.

Upon release, if offenders cannot provide proper documentation regarding programs and work completed during incarceration, this could increase the difficulty of obtaining employment. The more difficult it is for an offender to re-enter society, the more likely the offender is to commit another crime and return to prison, which affects MDOC's recidivism rate. Offenders should be able to rely on MDOC to maintain their data and help them successfully return to life outside of prison.

Impact on Sentence Computation

Sentence computation is the calculation of the amount of time an offender is required to be under the supervision and management of MDOC. To calculate an offender's release

Issues with sentence computation in Offendertrak could lead to offenders serving more time than necessary, or offenders not satisfying their true sentence requirements.

dates in Offendertrak, Records staff enter the offender's sentencing information exactly how it appears on the offender's court documents. This information includes:

- offense date;
- sentencing date; and,
- pre-sentence jail time credit (if awarded by the courts).

These dates are important in calculating an offender's release date, including:

- parole eligibility;
- earned release supervision date;
- discharge dates; and,
- house arrest date (if part of the sentence).

Once the sentencing information has been entered into Offendertrak, the system calculates the release dates and generates a timesheet. As the offender earns time off their sentence while incarcerated (e.g., TET, MET), Offendertrak updates the offender's timesheet to reflect the appropriate release dates. It is important to note that the release dates are calculated based on the individual offender's eligibility for certain releases.

PEER reviewed timesheet and release dates for a sample of 25 offenders. While all of the reviewed timesheets contained the correct release dates, one offender did not have a complete timesheet and was missing earned time. Exhibit 12 on page 45 provides an example of inconsistent data regarding earned time in Offendertrak. The exhibit provides the offender's timesheet that did not have the correct earned time and provides the offender's timesheet after MDOC corrected the issue. According to MDOC staff, as a result of S.B. 2795, it coded Offendertrak to recalculate release dates for eligible offenders.⁹ According to MDOC, the offender in Exhibit 12 and other offenders affected by S.B. 2795 (2021 Regular Session) were missing earned time credit as a result of the release date recalculations. Per MDOC staff, the offender's timesheet should reflect 1 year

⁹ During the 2021 Regular Session, the Mississippi Legislature enacted S.B. 2795, which updated the amount of time that offenders were required to serve before becoming eligible for parole. For example, non-violent offenders are now eligible for parole after serving 25% or 10 years of their sentence.

and 79 days of earned time credit. MDOC states that the problem has been noted, and it is more thoroughly reviewing offenders for this issue.

Exhibit 12: One Offender's Timesheets from Offendertrak

Timesheet Missing Earned Time

Begin Date	House Arrest Date	Parole Date	ERS Date	Tentative Discharge	Max Discharge	End Date
04/17/2019		04/15/2024	12/02/2026	02/19/2028	04/14/2029	
Total Term To Serve: 10Y		Total Earned Time: 0D	Earned Time Lost: 0D	Total MET Earned: 0D	Total Trusty Time Earned: 1Y 55D	

Timesheet with Correct Earned Time

	Begin Date	House Arrest Date	Parole Date	ERS Date	Tentative Discharge	Max Discharge	End Date
Calculated:	04/17/2019		04/15/2024	01/01/2027	03/20/2028	04/14/2029	
Override:							
Total Term To Serve: 10Y		Total Earned Time: 1Y 79D	Earned Time Lost: 0D	Total MET Earned: 0D	Total Trusty Time Earned: 1Y 25D		

SOURCE: Offendertrak timesheet for one offender as of June 1, 2022.

As discussed on
page 30

MDOC staff will place an "update-only" flag on an offender's account that has persistent issues with sentence computation. PEER obtained information for all offenders with an update-only computation flag and reviewed a sample of 100 offenders. Of the 100 offenders reviewed, 92 had sentence computation overrides to correct an issue. Common issues included the following:

- Parole dates needed to be corrected after MET was applied.
- Release dates such as Earned Release Supervision and MET were corrected after an error with recalculations due to S.B. 2795.
- Prior to S.B. 2795, parole dates were added as a result of *Keys v. State*.¹⁰

Inaccurate and missing sentence computation information could affect an offender's time in prison. The system calculated release dates that were later than necessary for some offenders, and dates earlier than necessary for others. It is important to note that MDOC corrected these issues after reviewing individual offender files.

¹⁰ *Kenneth W. Keys v. State*, 67 So. 3d 758 (Miss. 2011) provides that if an offender has a sentence that is parole-eligible, and subsequently gets a sentence for a crime that is not eligible, then that offender must keep the parole eligibility date of the first sentence. If the Parole Board grants parole on the first sentence the offender is not to be released and should begin serving the non-eligible consecutive sentence immediately.

Why is MDOC's offender data unreliable, inaccurate, and incomplete?

This chapter sought to answer the following questions:

- How does Offendertrak contribute to unreliable, inaccurate, and incomplete offender records?
- How do MDOC's management and processes contribute to unreliable, inaccurate, and incomplete offender records?
- What are other issues contributing to MDOC's unreliable, inaccurate, and incomplete offender records?

How does Offendertrak contribute to unreliable, inaccurate, and incomplete offender records?

MDOC's system, Offendertrak, contributes to unreliable, inaccurate, and incomplete data in a variety of ways. For example, the system is regularly unavailable to facility staff and it lacks the automation needed to identify potential data errors or inconsistencies.

Refer to
page 49

Offendertrak includes inaccurate and incomplete offender records. While some of the issues with data accuracy and completeness are due to inconsistencies in system usage by prison facility staff, the system itself causes problems and impacts the reliability of the data. The following sections provide an overview and examples of ways Offendertrak contributes to unreliable, inaccurate, and incomplete offender records, therefore, impacting the overall integrity of MDOC's data.

System Unavailable during Work Hours

MDOC's systems are often unavailable during working hours which disrupts workflow and the management of offenders.

While MDOC's policies and procedures state that MDOC operations should not be interrupted or conflicted by maintenance or upgrades to computer networks and applications during normal business hours,¹¹ MDOC staff complained that Offendertrak and Legato are often unavailable during working hours, due to software updates, maintenance, or other issues. Because facilities are required to be operational at all times, this disrupts workflow and the management of offenders. According to facility staff, the systems can be down for hours or days, depending on the problem or update. This issue is even more prevalent on the weekends, where it can be the next business day or even longer before the systems are available for use. As a result, until the systems are accessible, facility staff are required to either:

¹¹ MDOC defines normal business hours between 8:00 a.m. and 5:00 p.m.

- wait until the system comes back online;
- write offender information down on pieces of paper; or,
- print information from the system ahead of time and operate with hard copy files.

As a result, this adds an unnecessary burden to facility staff and increases the possibility of data errors.

In addition, during the course of this review, MDOC updated Legato. This update caused an issue with offender documents loaded in the system. PEER attempted to review several documents after the update, and could no longer open the files. Specifically, the documents that would not open displayed an error message in the system.

Lack of a Data Dictionary

A data dictionary serves as an internal quality control for management information systems. A data dictionary provides system users with information on data elements or fields within a database, including their definitions, descriptions, computer codes, and values. According to NIC, an automated offender management information system should include a data dictionary that precisely defines all data in the database, and the definitions need to:

Offendertrak does not have a data dictionary that precisely defines all data elements in the database. This leads to an improper or conflicting understanding of data elements.

- be operational and clear;
- identify the source of the information; and,
- classify whether the information is verified, how, and by whom.

While a data dictionary helps to ensure the reliability, completeness, and accuracy of the data entered into a database, MDOC does not have a data dictionary. MDOC staff stated to PEER that a data dictionary is not necessary. PEER notes that with over 5,000 data fields and 3,000 active user accounts in Offendertrak, the lack of a data dictionary leads to improper or conflicting understanding of data elements, and difficulty establishing consistency of data and queries across time and users. For example, MDOC staff did not have descriptions and definitions for approximately 50 data fields in the database readily available upon request. In addition, some of the descriptions and definitions were limited or missing and did not include whether or not the data field had a dropdown box or supported free text.

As discussed on
page 28



MDOC has issues with the system automatically populating incorrect keep-separates for offenders during mass movement. PEER determined that this issue begins at the data entry level because prison facility staff inconsistently enter keep-separate information for offenders. Another example includes the way users enter “common labor” into the system. “Common labor” is a term MDOC assigns to offenders. While some users stated that offenders assigned into “common labor” are not eligible to earn any time off of their sentences, other users stated

A data dictionary would ensure that at the very least users are entering information into the system consistently.

that they are. As a result, information entered regarding “common labor” offenders is inconsistent.

Lack of Database Constraints and Automatic Error Checks

Offendertrak does not:

- have constraints built into the system to ensure that data entered into one table automatically links to all tables in the database reporting the same data;
- actively seek to ensure the quality of offender data by ensuring data is consistent, valid, and intact;
- prevent users from creating forms for offenders in error; and,
- flag potential errors or prevent impossible information from being entered into the system.

While a database should have constraints built into the system that ensure references between data are consistent, valid, and intact, Offendertrak does not have these constraints built into the system. Additionally, the system does not have the capability to prevent out-of-range data from being entered, e.g., a two-year-old offender.

As a result:

- Offendertrak users are required to make changes on multiple screens to ensure information has been updated or removed from all screens;
- forms are easy to create, even in error, and often remain in the system for years before being corrected;
- offenders appear on reports in the system erroneously; and,
- Offendertrak users can enter incorrect information, such as impossible birth dates, and the system will allow it.

Systems not User-friendly

Offendertrak is difficult to learn and hard to navigate. Additionally, system users reported similar issues with Legato.

While a management information system should have a user-friendly interface that allows users to easily and timely access, use, and understand data stored within the system, Offendertrak users struggle with operation and navigation of the system on a daily basis. This increases the opportunity for errors, makes it difficult to quickly and effectively inform decisions, and reduces the overall integrity of MDOC’s data.

Examples of issues described by system users include but are not limited to the following:

- inability to quickly access and use reports to make decisions;
- required to navigate across different screens to enter and remove information from the system, including closing one screen to view another screen;
- ineffective movement of data to decision points;
- required to check boxes on certain screens in order for all information to appear;

- difficulty loading information;
- limited visibility of text (e.g., comments on forms do not display all of the information); and,
- difficulty printing data and reports.

Users also reported issues using Legato, with some prison facility staff stating that it was even more difficult to navigate than Offendertrak.

Computer Code Errors

The computer code used to produce Offendertrak reports and sentence computation is unreliable. As discussed on pages 21 and 26, reports in Offendertrak often produce incorrect end dates for programs and incidents. As discussed on page 44, the system also incorrectly calculates sentence computation, especially when changes, such as earned time, are being made to an offender's computation.

Issues with Historical Data

PEER requested active offender data as of March 1, 2022. However, MDOC could not provide active offender data for the requested date. According to MDOC staff, MDOC takes snapshots of active-offender related data in Offendertrak on June 30th and December 31st of each year. Due to this, MDOC cannot pull census information for the active offender population for a specifically requested date.

Useless Report Writing Tool

Offendertrak has a report writing tool built into the system that prison facility staff can use to produce needed information. However, PEER determined that it does not work. Prison facility staff stated that even when it did work, they had trouble using the tool and it often produced unreliable results. Therefore, prison facility staff have often been required to contact the Central Office for any report not already produced by the system.

How do MDOC's management and processes contribute to unreliable, inaccurate, and incomplete offender records?

MDOC has limited internal controls. This contributes to inconsistencies and errors in its offender data.

MDOC has limited internal controls. This contributes to the data issues discussed throughout this review, including:

- no official source for an offender's master record;
- limited system training;
- lack of data and offender record audits; and,
- inefficient and inconsistent processes, policies, and procedures.

The following sections provide an overview and examples of how MDOC's management and processes have contributed to unreliable, inaccurate, and incomplete offender records, therefore, impacting the overall integrity of MDOC's data.

No Master Record

While PEER did not review hard copy records, except those scanned into Legato, neither Offendertrak nor Legato contains a complete record for offenders. While information contained in Offendertrak, Legato, and the offender's hard copy record should match, prison facility staff stated that this is not always the case. There is some information maintained in Offendertrak that will never be scanned into Legato or placed in the hard copy record, and vice versa.

MDOC and facility staff do not agree on which source is an offender's master record which causes confusion and leads to incomplete and missing offender records.

According to MDOC staff, the hard copy record is the offender's working file and should be continuously updated during an offender's incarceration. However, MDOC's policies and procedures do not provide a clear distinction between the hard copy record and Legato, making it seem like the working file could technically be either source. This distinction is important because staff reported that there are instances where the two sources will not contain the same information.

Exhibit 13 on page 51 illustrates the different sources MDOC and prison facility staff consider to be an offender's official record.

Exhibit 13 on page 51 provides the offender's official master record as described by MDOC and prison facility staff. As shown in the exhibit, there is little agreement between staff on which source should be used to provide information.

This is an issue because hard copy records are destroyed once an offender leaves MDOC custody. However, if files from the hard copy record are not scanned into Legato or the data is not entered into Offendertrak, the record will be lost. According to prison facility staff, the official record used to provide information is dependent upon the information requested.

MDOC's inefficiencies in recordkeeping for offenders could affect prison facility operations and offender supervision and management. These inefficiencies cause confusion amongst prison facility staff and could impact decisions made regarding offenders.

Exhibit 14 on page 52 provides a chart describing MDOC's inefficiencies in ensuring that all hard copy records are simultaneously transferred with offenders as required by policies and procedures.

Exhibit 13: Different Sources Considered to be an Offender’s Official Record, as Described by MDOC and Prison Facility Staff

PEER interviewed staff at prison facilities responsible for records, classification, supervision, security, programs, and offender movement to define which source is considered to be an offender’s official record.

Facility	Offendertrak	Legato	Hard Copy Record	Depends on the Question	Separate Database
Bolivar County Correctional Facility	√	√	√		
Central Mississippi Correctional Facility				√	
Forrest County Jail*					√
Grenada County Jail				√	√
MDOC Central Office	√	√			
Mississippi State Penitentiary	√	√	√		
Parole Board	√	√			
South Mississippi Correctional Institution	√	√	√		√
Stone County Correctional Facility			√		
Wilkinson County Correctional Facility		√			

*Forrest County Jail does not have access to Offendertrak or Legato. The facility uses its own internal system, and works with MDOC’s Central Office staff to provide information on any state offenders housed within the county jail.

SOURCE: PEER analysis of interviews conducted with MDOC, prison facility staff, and the Parole Board.

Exhibit 14: Inefficient Transfer of Hard Copy Offender Records

What Should Happen with an Offender's Hard Copy Record



Hard Copy Record Should be Transferred with Offender

MDOC's policies and procedures require an offender's hard copy record to be simultaneously transferred with the offender from one facility to the next.



If Not Simultaneously, the Record Should Arrive within 72 Hours

According to MDOC's policies and procedures, an offender's hard copy record should arrive at the offender's new facility no later than 72 hours after the offender.

What Actually Happens with an Offender's Hard Copy Record



Offender Transferred without Hard Copy Record

According to prison facility staff, offenders are not consistently transferred with their hard copy record.



Prison Facility Staff Waits for the Record to Arrive within 72 Hours

Prison facility staff stated that the hard copy record often doesn't arrive within the required 72 hours.



Prison Facility Staff Creates a Temporary Record for the Offender

After waiting for the record to arrive, prison facility staff creates a temporary record for the offender and prints any available documents from Legato to add to the record.



The Original Record May or May Not Arrive at the New Facility

The offender's original record may never arrive at the new facility. Prison facility staff continues to add documentation to the temporary record.



An Offender Could Have Multiple Hard Copy Records during Incarceration

Offenders often have multiple hard copy records with various information and documentation during incarceration.

SOURCE: PEER analysis of interviews conducted with facility staff.

Limited Training on How to Operate the Systems

According to prison facility staff, user training on how to operate Offendertrak is limited, and training for Legato has been almost nonexistent. While MDOC does have virtual user guidelines available on their virtual network, during facility visits, staff reported issues with the guidelines, including the inability to access the guidelines when needed.

Limited training for Offendertrak and Legato users contributes to the inconsistencies and errors in MDOC's offender data.

Many users stated that MDOC provided training before and right after it began utilizing Offendertrak in 2003. However, most newer users are not provided formal training, but are either taught by other users or are required to teach themselves by trial and error. Prison facility staff stated that issues with data being incorrectly input into the system often arise when staff has not been properly trained or provided guidelines on how to use the system.

Because the accuracy and reliability of the data depend on who enters the information into the system, providing user training would help improve data integrity by increasing consistency and decreasing data entry errors.

Lack of Data and Offender Record Audits

MDOC does not conduct offender record audits as required by its policies and procedures. These audits would help MDOC improve the accuracy and completeness of its data.

Pursuant to policies and procedures, MDOC's Records staff should conduct regular audits of offender records to ensure that all records are current and accurate. Further, MDOC's *Sentence Computation Reference Handbook* requires all sentence computations to be verified by an auditor, including each time a calculation is created or an existing calculation is amended.

PEER determined that Records staff do not practice formal auditing procedures to determine the accuracy and completion of all offender records. According to MDOC staff, offender records may be reviewed at various stages based on the staff's discretion or when issues may arise.

Additionally, MDOC Records staff stated that sentence computation audits by a second auditor are not conducted if the Records staff inputting the information is considered "veteran staff." A veteran staff member is defined by MDOC as a staff member with three or more years of experience.

As a result, MDOC has outdated and incomplete records and issues with sentence computation. If MDOC implemented audits to update its offender records as required by its policies and procedures, its data and records would be more reliable.

Inefficient and Inconsistent Processes, Policies, and Procedures

MDOC and prison facility staff have inefficient and inconsistent processes, policies, and procedures. These inefficiencies and inconsistencies contribute to MDOC's unreliable, inaccurate, and incomplete offender data, which impacts the overall integrity of the data.

The accuracy and reliability of the data in Offendertrak depend on who enters the information into the system. According to facility staff, information is not always entered into the system the same way and errors can occur, especially when untrained, newer staff are responsible for entering the information. The following section provides examples of MDOC's inefficiencies and inconsistencies regarding data and records management.

MDOC does not ensure that system users consistently and efficiently enter information into Offendertrak and properly manage offender records.

Confusion Regarding Data Entry Responsibilities for Offender Programs

While MDOC has policies and procedures for offender treatment, programs, and employment, it lacks clear guidelines for maintaining program and employment records. For example, while there are policies and procedures requiring offenders to receive certificates of completion, there is nothing stating where or how those certificates should be maintained.

Additionally, the policies and procedures do not require MDOC staff to enter program data into Offendertrak or Legato, allowing facilities the discretion to maintain records as they see fit. While MDOC's policies and procedures state that case managers should enroll offenders in and out of programs in the system, prison facility staff do not agree on who should be responsible for the task. Some facilities' staff stated to PEER that the task should be the responsibility of the program directors at each facility and not the case management staff.

Missing Policies and Procedures for Data Entry

Offendertrak users inconsistently enter information into the system due to the lack of policies and procedures regarding data entry, and no data dictionary for the system.

Reliance on Hand-Kept Records, Spreadsheets, and Word Documents

Not all facilities use Offendertrak to report offender program data. Facility staff relies on hand-kept records, spreadsheets, and word documents to monitor and track programs. Often these records are double counting offenders and do not always include all programs. For example, one program director uses a report in Offendertrak, the Alphabetical Roster, to report programs for offenders in a separate spreadsheet. However, according to MDOC, this report only includes an offender's most recent assignment, and would not include more than one program, even though some offenders are in multiple programs at one time. Therefore, that program director's spreadsheet may exclude programs for offenders with more than one assignment.

Data Manipulation and Limited Data Verification

MDOC uses data stored in Offendertrak and reports produced by the system to provide information to the public. MDOC publishes a monthly fact sheet on its website each month. According to MDOC, this data comes from a monthly report in Offendertrak. MDOC runs the report in the system at the end of every month and then creates a structured Excel report for the final information published on

its website. As previously discussed, these reports often contain errors, such as offender population numbers not adding to the total population in the document. PEER determined that this most likely occurs when MDOC imports the data into the spreadsheet and creates formulas to total the numbers.

PEER notes that reports from Offendertrak are not easily downloaded and often are required to be manually manipulated by a person. For example, the reports in Offendertrak are not in spreadsheet format, and a person is required to copy and paste information from the Offendertrak report into a spreadsheet in order to calculate and analyze information. Anytime data from its original source has to be manually manipulated, the integrity of the data is impacted and the likelihood of errors is increased.

PEER notes that MDOC staff often do not review their data for reasonableness before publishing the information on their website or providing it to other entities. Many of the errors with reports published on its website or provided to the Legislature should have been caught by MDOC staff prior to publication. This also shows an issue with MDOC staff making errors and not verifying the computer code used to extract the data from the system. MDOC could better ensure the quality of its data by having someone review the information prior to release.

Inconsistent Issue Resolution and Vacancies within MDOC's MIS Division

The helpdesk at MDOC's Central Office provides support to prison facilities, including but not limited to maintenance, system updates, and other technical support. Prison facility staff should submit a request for assistance through their ticketing system. According to MDOC, the helpdesk attempts to respond to requests as quickly as possible, but MDOC does not have policies or procedures outlining how long a response should take.

Prison facility staff reported issues with MDOC providing timely assistance for Offendertrak, Legato, and other network issues. Facility staff stated that they often have to contact the Deputy Administrator at the Central Office for help because helpdesk staff will not provide a timely response to requests, with some staff not responding at all. This issue could be due to one or all of the following reasons:

MDOC does not have policies or procedures that outline how long the helpdesk should take to respond to requests for assistance.

- As of March 2022, MDOC had 29 IT positions located at the Central Office and three at the state facilities responsible for helping all system users. PEER notes that 14 of the 29 positions were vacant, and six of those positions had been vacant since 2021.
- MDOC does not have policies and procedures to guide how prison facility staff report issues to the helpdesk, but prefers requests to be made through the ticketing system. However, some requests are received through email and telephone calls instead of the ticketing system. The helpdesk resolves requests reported this way in an ad-hoc fashion and does not formally track these requests.

- PEER reviewed helpdesk tickets from July 1, 2021, through May 24, 2022. During this time period, MDOC received over 5,764 tickets. PEER determined that approximately 1,986 of these tickets (34%) were related to Offendertrak and Legato issues (e.g., login, user permissions). PEER estimated this number using helpdesk ticket descriptions used by MDOC to assign requests. PEER notes that this number could be more or less depending on the accuracy of the data provided by MDOC.
 - 1,521 of the 1,986 tickets have been resolved by MDOC as of May 24, 2022. On average it took MDOC seven and a half days to respond and resolve these tickets, ranging from less than half a day to over 273 days. According to MDOC staff, they have an issue with helpdesk staff not promptly updating ticket resolution times in the system.
 - 162 of the 1,986 tickets had no resolution date, even though MDOC stated that all tickets had been resolved.
 - 303 of the 1,986 tickets had a system-generated future close date (e.g., December 31, 9999). According to MDOC, helpdesk staff responding to requests should update the system-generated date once a ticket has been resolved. However, this does not always occur.

Inefficient and Inconsistent Reporting of Data (e.g., Offender Incidents)

While MDOC's disciplinary policies and procedures provide a list of categories for rule violations, facility staff stated that disciplinary action is at the discretion of the superintendent, warden, and facility. There were no policies or procedures indicating that MDOC regularly audits RVRs to ensure accuracy and consistency of the data amongst facilities. Additionally, according to Records staff, facilities do not input RVR information into the system in a timely and efficient manner. This can cause issues for Records staff if an offender wins an appeal to remove the RVR from the offender's record. Records staff stated that they cannot remove an RVR from the offender's record if it has not been entered into the system. Therefore, Records staff will keep the hard copy documentation until the facility contacts them regarding the removal of the RVR from the offender's record. In some cases, the facilities will never contact Records, and the RVR will not be removed from the system.

Inefficiencies in Scanning Documentation into the System

According to MDOC, there are 393 Legato users, with only 140 of those users having access to scan information into the system. Prison facility staff stated that program certificates are faxed, mailed, and emailed to Records. However, Records staff stated that prison facility staff do not consistently provide documentation to be scanned into the system. This miscommunication between Records and facility staff prevents important information (e.g., program certificates) from being properly scanned into Legato.

Unlabeled and Improperly Scanned Files

MDOC does not ensure that documentation is consistently scanned into the system. PEER notes that documentation in Legato is often hard to find, unlabeled, or scanned under the wrong booking or wrong offender. This makes it difficult to compare documentation to the information entered into Offendertrak.

What are other issues contributing to MDOC's unreliable, inaccurate, and incomplete offender records?

Other issues contribute to MDOC's unreliable data, including but not limited to unlinked systems, varying court documents, and changes in sentence computation laws.

PEER identified other issues contributing to MDOC's unreliable, inaccurate, and incomplete offender records, including:

- **Unlinked systems at regional facilities, private prisons, and county jails:** These institutions utilize other offender management information systems that do not interface with Offendertrak or Legato. This results in staff inputting data into their systems, and the state's system, which could lead to errors in either system. When Offendertrak is unavailable, the prison facilities are required to enter the information into their system and wait until Offendertrak is available again. As a result, data will be updated and correct in one system, but incorrect in another.
- **Court documents (e.g., sentence orders) vary by county:** Court documents are not consistent among counties. MDOC staff stated that court documents can be confusing, and staff is often required to call the courts to verify the information to ensure the correct sentences are entered into the system. This decreases their timeliness in establishing the record.
- **Sentence computation laws change and require computer code to be updated:** The Legislature updates parole eligibility requirements, which can change the amount of time that offenders are required to serve. When this occurs, MDOC is required to update the computer code in Offendertrak that calculates sentence computation. According to MDOC staff, they test calculations and the code until staff is comfortable that it matches closely enough.
- **Incorrect information provided by offenders:** Offenders do not always provide the most accurate and current information. MDOC staff enters information exactly how it appears on the offender's court documents. If offenders are not truthful, the information could be entered into the system incorrectly.

How can MDOC improve the reliability, accuracy, and completeness of offender data as it transitions to a new offender management information system?

This chapter sought to answer the following questions:

- What is the status of Offendertrak?
- What steps has MDOC taken to prepare for transitioning to a new offender management information system?
- What are the primary goals of a new system?
- What are the challenges of transitioning to a new system?
- What systems are other states using to manage offender records?

What is the status of Offendertrak?

Offendertrak, is an outdated and inefficient legacy system that is nearing the end of its useful life and will no longer be supported by the system's vendor as of June 30, 2025.

MDOC entered into a contract with Motorola Solutions, Inc., (Motorola) on September 7, 2002, to purchase and install Offendertrak, a comprehensive prison management system. The original contract with Motorola included software, installation services, technical support, maintenance, and training on how to use the new system.

Currently, Offendertrak is an outdated and inefficient legacy system. While the system maintains a large amount of data, it is hard to use and often produces erroneous reports. Additionally, it is sometimes unavailable during working hours due to updates and overall system issues. According to the software agreement with Motorola, Offendertrak will reach the end of its life on June 30, 2025, and will need to be replaced by MDOC. After this date, Motorola will no longer support the system (i.e., provide software support and maintenance). Once Offendertrak reaches the end-of-life date, MDOC will be responsible for all maintenance and upkeep of the Offendertrak software. If a new system is not acquired or built to replace Offendertrak, the issues identified during this review will continue to compound.

MDOC's original contract included a software support agreement for five years, with the option to extend the agreement beyond the original terms of the contract. MDOC has opted to extend

the software agreement with Motorola five additional times, with each agreement providing three additional years of support. The contract with Motorola states that the cost of software support and maintenance shall not increase more than five percent per year. As shown in Exhibit 15 on page 59, from December 1, 2013, through November 30, 2021, MDOC paid more than a five percent increase each year, ranging from 5.86% to 6.31%.

MDOC did not conduct due diligence related to software support agreements with Motorola, resulting in an overpayment of approximately \$23,999.

When replacing Offendertrak, MDOC should ensure that it conducts due diligence to ensure that it does not overpay for the contract or software support agreements.

Exhibit 15: Offendertrak Software Support Agreements from December 1, 2008, to November 30, 2024

Agreement	Start Date	End Date	Amount	Percent Change	Overpayment
1	12/1/08	11/30/09	\$238,014.00	0	
1	12/1/09	11/30/10	\$238,014.00	0	
1	12/1/10	11/30/11	\$238,014.00	0	
2	12/1/12	11/30/13	\$229,311.00	-3.66%	
2	12/1/13	11/30/14	\$243,776.00	6.31%	\$2,999.45
2	12/1/14	11/30/15	\$258,966.00	6.23%	\$3,001.20
3	12/1/15	11/30/16	\$274,914.00	6.16%	\$2,999.70
3	12/1/16	11/30/17	\$291,659.00	6.09%	\$2,999.30
3	12/1/17	11/30/18	\$309,242.00	6.03%	\$3,000.05
4	12/1/18	11/30/19	\$327,705.00	5.97%	\$3,000.90
4	12/1/19	11/30/20	\$347,088.00	5.91%	\$2,997.75
4	12/1/20	11/30/21	\$367,443.00	5.86%	\$3,000.60
5	12/1/21	11/30/22	\$367,443.00	0	
5	12/1/22	11/30/23	\$380,266.00	3.49%	
5	12/1/23	11/30/24	\$389,072.00	2.32%	
TOTAL			\$4,500,927.00		\$23,998.95

SOURCE: PEER analysis of Motorola Solutions, Inc., contracts with MDOC.

What steps has MDOC taken to prepare for transitioning to a new offender management information system?

While MDOC will have to work with ITS to procure a new offender management information system, it has not begun planning for the procurement.

According to ITS, the planning, procurement, and implementation process can take approximately four years to replace a legacy management information system.

MDOC has not begun the process of replacing Offendertrak. According to ITS, planning for and replacing a legacy database management information system can take approximately four years. Before MDOC can issue a procurement, it will need to complete market research to determine what offender management information

systems would be viable options to replace Offendertrak. Exhibit 16 on page 60 provides an estimated timeline for procuring a new offender management information system. According to ITS, the total time it takes depends on the agency and the requirements of the new system. As shown in the exhibit, MDOC should have begun planning for the procurement in 2021.

Exhibit 16: Estimated Procurement Timeline for a New Offender Management Information System to be in Place by December 2025

September 1, 2021
<ul style="list-style-type: none">• Submit an initial procurement request to ITS to receive a place in the ITS procurement work queue• Perform market research on existing offender management information systems (2 months)• Hire a procurement consultant to assist with market research (optional)
November 1, 2021
<ul style="list-style-type: none">• Determine and create the technical specifications needed for the new system, and write the procurement (2 months)
January 1, 2022
<ul style="list-style-type: none">• Advertisement, award, and approval of procurement (1 year)
January 1, 2023
<ul style="list-style-type: none">• Begin implementation of new system (2 to 3 years)
June 30, 2025
<ul style="list-style-type: none">• Offendertrak reaches end of life
December 31, 2025
<ul style="list-style-type: none">• Complete implementation of new system

SOURCE: PEER analysis of information provided by ITS.

In the first stage of procuring a new offender management information system, MDOC will submit a procurement request to ITS. Once the procurement request is submitted, it is assigned to a technical consultant at ITS whose job is to work with MDOC to create the technical specifications and other criteria necessary to develop the procurement.

MDOC will need to review offender management information systems and technologies currently on the market and being used by other states to decide what capabilities it wants its new system to have. According to ITS, some agencies will perform this market research on their own. However, other agencies will hire a procurement consultant to assist with reviewing the available technologies on the market. Though not required, procurement consultants can also be contracted to help agencies write their procurements. The first stage is estimated to take about two months.

In the next stage, MDOC will need to write a procurement request. Once the request is written, ITS staff review and amend the information to ensure that it meets state procurement laws. This is estimated to take about two months.

Once the request is approved by ITS staff, it can be advertised, awarded, and approved by the ITS Board. According to ITS, the approval process can take about one year.

In the final stage, a new offender management information system will be implemented at MDOC. PEER determined that implementation of a new offender management information system can take two or three years. ITS contends that implementation periods depend on many factors including the agency's willingness to allow its employees to train and provide feedback on the new system.

Hawaii's Efforts to Replace Offendertrak

As further
discussed on
page 65



PEER conducted a survey of offender management information systems used in all 50 states. PEER determined that only one state, Hawaii, is currently using Offendertrak to maintain its offender data. However, because Offendertrak is approaching the end of its life, Hawaii has already begun the process of replacing the system with a new offender management information system.

In 2019, Hawaii issued a Request for Information (RFI) to obtain a better understanding of:

- the various vendors providing offender management information systems; and,
- the types of technological specifications available to improve the management of offender data and strengthen the analysis of the data to make decisions.

According to corrections staff in Hawaii, the RFI has been essential in helping the state create the Request for Proposal (RFP) to procure the new system. In Hawaii, the state is considering options that allow the offender management information system to interface with other systems, e.g., law enforcement, health care, education. This would allow for more collaboration regarding the care and treatment of offenders in the state's custody.

As of July 20, 2022, Hawaii has not yet published the RFP but is in the process of finalizing the document for publication. Staff in Hawaii stated that they were told by a procurement consultant that implementation of a new system takes at minimum two and a half to three years. Hawaii is diligently working to have its system replaced by June 30, 2025.

What should be the primary goals of a new system?

An effective offender management information system will allow the state to collect data that is structured to facilitate analysis and make more informed decisions regarding offenders and corrections policy. A good system will also ensure that that data is accurate and complete.

The primary goals of a new offender management information system should be to:

- collect data that is structured to facilitate analysis that can be used by MDOC, prison facility staff, and policymakers to make more informed decisions regarding offenders; and,
- ensure that data entered into the system is accurate and complete to increase the integrity of the state's offender data.

Collecting Data that is Structured to Facilitate Analysis

A new offender management information system should collect data that is structured to facilitate analysis for both policymakers and MDOC's internal stakeholders to assist in the decision-making process.

For policymakers, the system should produce reliable reports that answer important public policy questions regarding corrections, including:

- What is the total prison population by county and/or facility?
- What is Mississippi's recidivism rate?
- How effective are MDOC's programs in reducing recidivism?
- Is there a correlation between offender behavior and post-release offending?
- Are prison facility staff and offenders safe from violence?

For internal stakeholders, such as prison facility staff, the system should capture data to support:

- classification decisions, including security class, medical class, and housing location;
- offender programs and treatment;
- release dates (e.g., parole eligibility);
- resource allocation and facility planning; and,
- crowding control.

Ensure Accurate and Complete Data to Increase Efficiency

A new offender management information system should ensure that data entered into the system is accurate and complete. According to NIC, a well-developed classification and offender management information system should adequately address the following four critical design components:

An offender management information system should easily answer important questions regarding offenders and corrections, including but not limited to recidivism rates, program data, security, housing location, and resource allocation.

- **Information content:** the range and kind of information collected and stored in the system. The system should include a “data dictionary” that precisely defines all data elements in the database.
- **Functionality:** the way the system collects, stores, retrieves, organizes, and presents data. An effective system promotes timely and efficient user management of data.
- **User interface:** the interaction between the user and the software. The system’s interface must be easy to navigate, understand, and learn.
- **Outputs and reports:** the reports produced by the system and used by management to support decisions regarding offenders.

An offender management information system should have the capacity and capabilities to ensure that data entered into the system is accurate and complete to increase efficiency and enhance public safety.

These four system components and implementation of internal controls are essential to ensuring that all stakeholders have the most reliable, accurate, and complete information needed to make the most efficient and effective decisions regarding offender management and corrections to enhance public safety.

Other important functions of good offender management information systems, include but are not limited to:

- **More automation:** automation saves staff time, reduces errors, and produces greater consistency in decisions.
- **Link to other criminal justice systems:** the ability to interface with other criminal justice management information systems in the state is important for cross-verification, efficiency, and comprehensiveness of data. For example, if MDOC’s system could interface with the state’s court system, instant offense information and court dates could be imported into MDOC’s system without having to enter information from the court documents.
- **Error checks and validation:** built-in error checks that automatically identify and flag outlier patterns and “strange cases” help ensure accurate and complete information is entered into the system.
- **Documentation:** a system that allows users to scan in documentation with the offender’s data would reduce the amount of paper files system users are required to maintain.

The Corrections Technology Association (CTA) published the *Common Business Functions for Correctional Management Systems* to define functional standards for the corrections industry to help state correctional agencies improve the business value of their offender management information systems and foster exchange of knowledge and experience across states. The document is intended to help individuals involved in procuring, developing, implementing, and/or supporting an offender management information system for state and local correctional agencies. Appendix C on page 75 provides a list of the 17 business functions identified by CTA, including but not limited to:

- reception and commitment;
- sentence calculation;
- caseload management;
- security; and,
- discipline.

Appendix C on page 75, provides a description of the processes and objectives associated with each business function identified by CTA.

What are the challenges of transitioning to a new system?

Prior to transitioning to a new offender management information system, MDOC will need to review and update all of its current offender data in Offendertrak to ensure accurate and complete data is transferred from the system. MDOC also needs to strengthen the integrity of its data by ensuring that it implements effective internal controls to better manage offender data.

While Offendertrak is at the end of its life and will need to be replaced by June 30, 2025, there are several challenges MDOC will have to overcome in order to transition to a new system. These challenges include but are not limited to:

- **Incomplete and inaccurate data:** As discussed throughout this review, MDOC's offender data is inaccurate and incomplete. MDOC will need to ensure that all data in Offendertrak is accurate and complete before transitioning to a new system in order to avoid the same issues it already has.
- **No master record:** MDOC staff is not in agreement as to which source (i.e., Offendertrak, Legato, and hard copy records) represents an offender's master record. Without agreement, staff has relied on different sources to obtain offender information. When MDOC transfers its current electronic information from Offendertrak into the new system, offender records will still be incomplete and staff will still rely on various sources for information to make decisions. Further, information from the various sources does not consistently match. Therefore, transferring data between systems without verification of information will result in the entry of inaccurate offender records into the new system. Additionally, some staff members rely primarily on hard copy records, which has resulted in a heavily paper-based system. If done properly and with effective internal controls over the system, limiting records to an electronic format would:

- provide more control over access to the system;

Transferring data between systems without verification of information from the old system will result in entry of inaccurate offender records into the new system.

- ensure more secure data;
 - minimize data inconsistencies; and,
 - allow more efficient searches for offender information.
- **Limited MIS staff:** MDOC has limited MIS staff at the Central Office. There are a total of 29 MIS positions located at the Central Office and three of the state facilities. As of May 13, 2022, 14 of those 29 positions were vacant. MDOC will need to ensure that it has the workforce needed to transition to a new system, while also ensuring that prison facility data requests and needs are being met during the transition.

As of May 13, 2022, 14 of 29 MIS staff positions at the Central Office were vacant.

- **Lack of internal controls:** MDOC currently lacks effective internal controls to manage offender data, and will need to implement better controls over its data prior to transitioning to a new system. For example, MDOC will need to update its policies and procedures to ensure that the information entered into Offendertrak and ultimately a new system is accurate, complete, and secure.

If MDOC does not update its current data and change the way it manages its data in the future, the same issues with incomplete, inconsistent, and unsecure data will persist no matter which system it chooses. The integrity of MDOC's data will still be limited.

What systems are other states using to manage offender records?

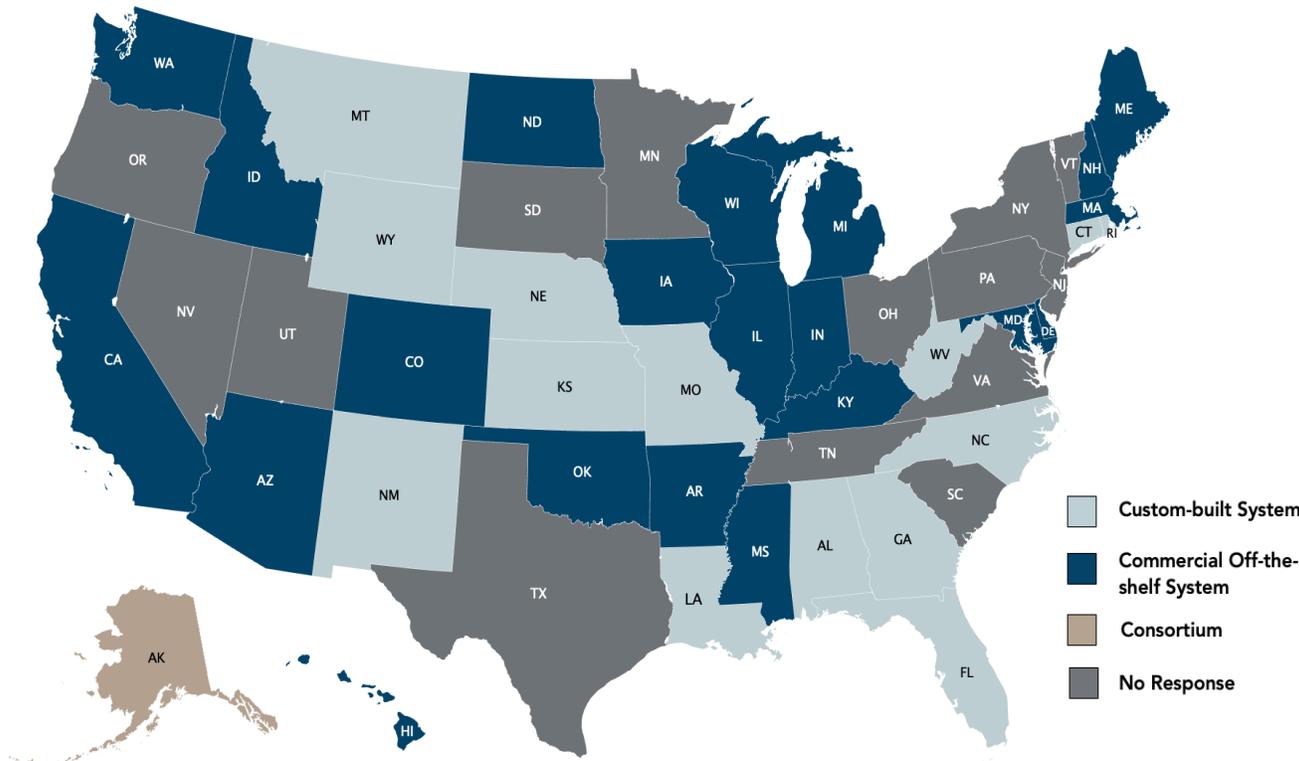
Offender management information systems can be built in-house, purchased from a vendor, or developed within an open-source consortium. PEER determined that in-house and vendor-based systems are the most common types of offender management information systems used in other states.

PEER sought to identify options that MDOC could consider to replace Offendertrak. In order to determine what options were available and being implemented by other states, PEER contacted and reviewed information on correctional systems for all 50 states. Exhibit 17 on page 66 illustrates which offender management information system options each state has chosen to use. As shown in the exhibit, the states have implemented one of the following options:

- in-house custom-built system;
- commercial off-the-shelf system; or,
- open-source solution (i.e., consortium).¹²

¹² Alaska is the only state that uses the now-disbanded National Consortium of Offender Management Information Systems.

Exhibit 17: Options used by Other States for Implementing an Offender Management Information System



SOURCE: PEER analysis of state offender management information systems.

PEER determined that purchasing an offender management information system from an existing vendor is more common than building a custom system. Additionally, PEER notes that some of the states reported that their offender management information systems had issues and were currently in the process of being replaced or due to be replaced in the next few years. For example, Louisiana is currently in the process of replacing its custom-built legacy system, CAJUN, which has been in place since the 1980s. According to Louisiana’s Department of Corrections staff, the state plans to use a custom-built system to merge its current system with another information system within the state.

The next section provides a brief overview of the available options.

Custom-built System

Custom-built systems are coded and built to meet the specifications the state requests. A custom-built system would allow MDOC complete control over all aspects of the system including support, updates, and design. MDOC would design and build all aspects of the system including but not limited to:

- modules;
- user access;
- data exchanges; and,

- security requirements.

Custom-built systems can be built in-house by a state's MIS staff or by a contracted vendor. If MDOC chose to work with currently employed MIS staff, MDOC would have to reassign those staff members' current job requirements in order to allow them to focus on creating the new system. MDOC's MIS division and ITS are already understaffed, so reallocating these staff to create a database could worsen issues caused by understaffing.

Commercial Off-the-shelf System

MDOC could purchase an offender management information system from an established vendor. By purchasing an existing system, MDOC would lose the ability to customize every individual aspect of the offender management information system. However, purchasing from a vendor allows MDOC to move more quickly into implementing the new software. Depending on how MDOC structures its upcoming procurement, purchasing offender management software from a vendor would place the responsibility of software support and maintenance on the vendor instead of MDOC. A common off-the-shelf system used by other states is MARQUIS Software, which provides core offender management functions, such as sentence and commitment tracking, biometric identification, and integrated risk and needs assessment.

Take No Action and Keep Offendertrak

Offendertrak is an outdated and inefficient system that limits MDOC's ability to effectively make decisions regarding offenders in custody. On June 30, 2025, the system will reach the end of its life, and the vendor will no longer provide system support or software updates. If MDOC does not to replace the system or chooses to wait until the system reaches the end of its life before beginning the procurement process, more problems will arise, including but not limited to:

- increased security threats;
- reduced data reliability; and,
- additional costs.

Recommendations

1. Because MDOC has extensive issues with its data and lacks the internal capacity needed to ensure all of its offender data is accurate and complete prior to being transferred to a new system, the Legislature should consider enacting legislation requiring ITS to provide special assistance to MDOC. The special assistance should include but not be limited to:
 - a. devising a timeline to assist in the process of cleaning and evaluating data, planning for the procurement of a new offender management information system, and developing an RFP to procure the new system;
 - b. updating all offender records to ensure data is reliable, accurate, and complete, and ensuring reports produced by the system are updated and accurate;
 - c. planning, selecting, and procuring a new offender management information system; and,
 - d. ensuring the accurate and complete offender data is transferred into the new system.

By September 1, 2023, MDOC and ITS shall enter into a binding agreement to ensure that the agreed-upon goals for MDOC are accomplished, and the two entities work together to ensure all steps of the process are implemented. Further, MDOC should provide bi-annual updates to the Joint Legislative Committee on Performance Evaluation and Expenditure Review (PEER), on the collaborative efforts to update offender data, procure a new system, and transfer the data until the project is complete.

2. The special assistance could cost approximately \$250,000 per year for FY 2024 and FY 2025, including the costs of one to two FTEs at ITS and contracts for consultants as needed to complete the project. To fund the project, the Legislature should consider requiring MDOC to pay ITS expenditures associated with the planning and support activities in an amount not to exceed \$250,000 per year, to assist in conducting activities associated with support provided prior to the development of an RFP. ITS shall itemize its expenditures for each fiscal year in which they are incurred and provide copies of all charges to the Mississippi Legislative Budget Office and the PEER Committee.
3. To ensure the integrity of its offender data, MDOC, with assistance from ITS, should implement the following internal controls:
 - a. update policies and procedures regarding offender records, including but not limited to the following areas:
 - i. the offender's master record;
 - ii. internal audit of offender records;
 - iii. definition and documentation for escaped offenders;
 - iv. location and status of offenders;
 - v. offender programs;
 - vi. helpdesk tickets; and,

- vii. overall data entry.
 - b. implement a plan to migrate all offender records to electronic files only, ensuring all files are properly scanned into Legato or entered into the offender management information system; and,
 - c. conduct periodic reviews of passwords to ensure compliance with MDOC's security plan and password requirements.
- 4. MDOC should conduct quality assurance to ensure that data and reports are accurate and reliable prior to publishing the information to its website or submitting the information in response to Legislative requests (e.g., recidivism rates for offender programs, monthly fact sheets).
- 5. To ensure the security and integrity of its offender data, MDOC should immediately update user roles and permissions across all facilities to establish consistency and ensure the concept of least privilege is implemented. This should include:
 - a. developing policies and procedures to ensure the proper assignment and removal of user permissions and roles, including ongoing monitoring of user access;
 - b. developing security roles based on position duties and responsibilities; and,
 - c. removing user access and permissions and adjusting user permissions when a user changes positions within MDOC.
- 6. MDOC should annually review offender program data for all offenders to ensure program completers have the proper documentation in their electronic records (e.g., completion date in Offendertrak, certificate in Legato).
- 7. MDOC should provide annual training and updated guidelines on how to use Offendertrak or any other system implemented to maintain offender records, including MDOC's security plan and password requirements. Further, MDOC should ensure all new users are properly trained on how to operate MDOC's systems by implementing a new user training program that must be completed before a user has full access to MDOC's systems.

Appendix A: Data Issues Observed through Comparison of 100 Offender Records in Offendertrak and Legato



Commitment and Sentencing

inconsistent sentence information in OT

sentence information does not match court documents; e.g., an offender with five counts on their sentencing order had only three counts in OT because of system limits



28% of offenders

nonmatching pre-sentence jail time

offenders are often awarded credit for jail time served prior to conviction; pre-sentence jail time does not match across systems



17% of offenders

pre-sentence jail time overridden in OT

pre-sentence jail time manually entered into OT by staff; missing specific dates



21% of offenders

sentence computation overridden

OT does not always calculate sentence computation correctly; MDOC staff checks numbers and overrides the system if there is an issue



8% of offenders

no audit of sentence computation

sentence computation is not always audited; staff with over three years' experience are not required to have an audit



18% of offenders

Victims

victim notification not listed in OT

offender had victim notification documentation in Legato but not OT



1% of offenders

missing documentation for victim notifications

not all offenders had documentation for notification



11% of offenders

Classification

no initial classification

offenders have not been through initial classification process (should take place during first few months of sentence)



5% of offenders

different custody status

should include the reason an offender is assigned to a certain custody status (e.g., new prisoner, probation revoked); often left blank in Legato



28% of offenders

nonmatching initial security level at admission

security levels at admission do not always match data in the system; this can occur when an offender has more than one booking



21% of offenders

different medical class

medical class does not always match data in the system; some offenders who have been in custody for many years did not have this data in the system



21% of offenders

nonmatching level of care

level of care does not always match data in the system; some offenders who have been in custody for many years did not have this data in the system



36% of offenders

nonmatching staff request for trusty status

classification documents in Legato had offenders listed under trusty status, but no staff request appeared in OT



16% of offenders

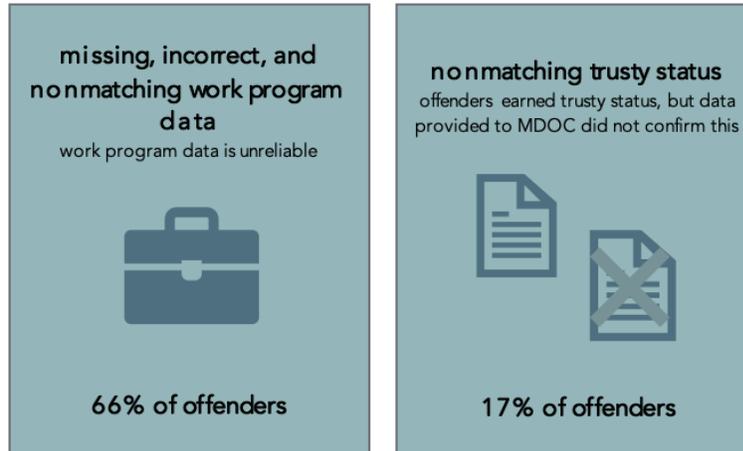
missing/nonmatching level of education

case managers do not always update highest levels of education



35% of offenders

Offender Programs and Trusty Status



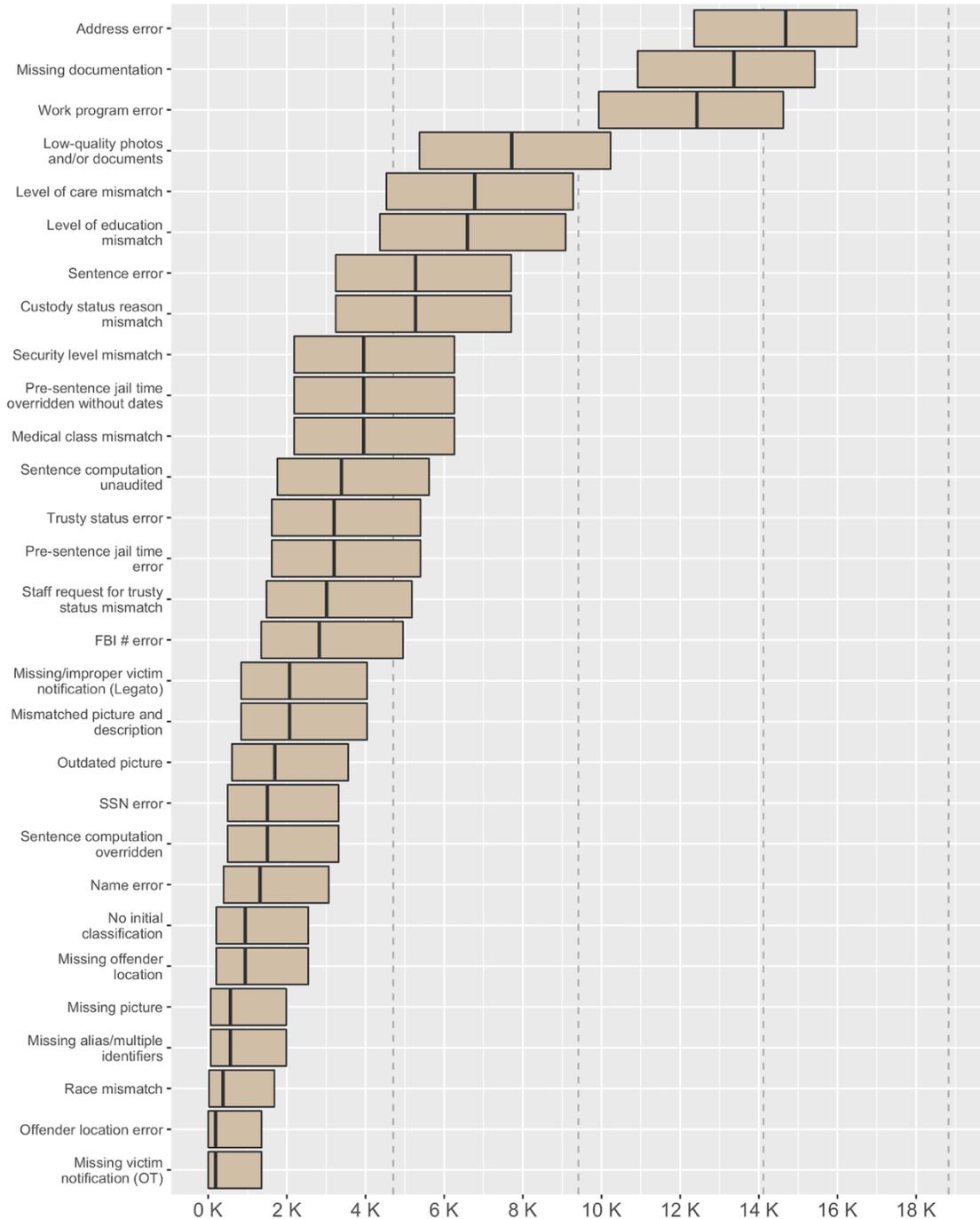
General Issues



SOURCE: PEER analysis of data in Offendertrak and Legato as of June 1, 2022.

Appendix B: Estimated Count of Active Offenders with Inconsistent, Incomplete, and Unreliable Data

Note: Estimates produced by the Clopper-Pearson binomial method. The confidence is at least 99% that the true value lies within the specified range. The dotted lines represent the total population and the 75th/50th/25th percentiles.



SOURCE: PEER analysis of data in Offendertrak and Legato as of June 1, 2022.

Appendix C: Offender Management Information System Business Functions Identified by the Corrections Technology Association (CTA)



Reception and Commitment

An Offender Management Information Systems (OMIS) should assist correctional agencies in admitting offenders into custody, and record important information, such as previous incarceration and criminal history, demographics, and photos. An OMIS should:

- streamline the intake process to reduce the average length of time between offender admission and assignment to a facility;
- track the average length of time to complete steps in the intake process and use the information to optimize staff resources;
- coordinate and schedule intakes with counties to balance the flow of new offenders; and,
- be used to maintain performance of the agency and facilities, e.g., identifying and managing special populations.



Sentence Calculation

An OMIS should calculate the offender's eligible release date once court commitments have been entered into the system. It should also recalculate release dates when an offender has earned or lost time on sentence. An OMIS should:

- avoid erroneous releases and the associated risks to public safety and potential threats of litigation;
- use projected release dates to forecast monthly releases, providing a key input into population projections and future demand for prison beds; and,
- support performance measures for victim notification, restitution, and time served.



Classification

An OMIS should apply an objective classification instrument that recommends offender custody level, factoring for security risk and program and healthcare treatment needs. The system should conduct risk and needs assessments to be used during the classification process. Further, the system should ensure that offenders are reclassified on a recurring basis. An OMIS should:

- optimally assign offenders to a housing location and when bed constraints exist, the system will prioritize placement based on risk;
- allow administrators to "re-configure" facilities, altering staffing and operations as necessary; and,
- monitor key performance measures, e.g., percentage of overrides, number of improperly housed offenders.



Caseload Management

An OMIS should assign offenders to counselors and provide alerts when case actions are due. The system should also define treatment goals for offenders based upon assessed needs, taking projected release dates into consideration. An OMIS should:

- allow tracking of aggregate demand for treatment programs to help administrators reallocate limited treatment resources to programs that are most needed by the offender population and to the locations where the programs are needed;
- assist in ensuring balanced caseloads and reallocating staff resources and offenders when necessary; and,
- capture performance metrics, such as the percentage of offenders with defined program goals and the percentage achieving their goals in the designated time frame.



Security

An OMIS should allow agencies to ensure it implements proper processes oriented around the management and operation of prisons and supervision activities. An OMIS should:

- reduce the time required to clear counts, which will reduce the potential for miscounts;
- provide investigators with intelligence to respond to incidents, e.g., escapes; and,
- automate selected facility management functions.



Discipline

An OMIS should record and categorize information about incidents, and assists facilities in charging offenders with rule violations and applying sanctions, e.g., assignment to restrictive housing, loss of credits and privileges. An OMIS should:

- track compliance with policies and manage risk by identifying systemic security and policy compliance issues, e.g., contraband;
- facilitate the use of objective, consistent processes for charging offenders with rule violations and applying sanctions; and,
- support the collection of performance measures, e.g., number of incidents resulting in serious harm.



Housing and Bed Management

An OMIS should track offender movement and bed assignment, including assigning offenders to beds to meet classification requirements, while enforcing offender separation requirements. An OMIS should:

- enable overall offender population management;
- provide an empirical measure of overcrowding, e.g., compare design capacity with offender assignments to depict trends in bed utilization; and,
- allow analysis of scheduled, planning, and waitlist movements to determine optimum use of transportation resources.



Health Care

An OMIS should allow agencies to assess and triage medical, mental health, and dental needs at intake and provide ongoing medical care and services to offenders during incarceration. An OMIS should:

- determine and document the extent the agency is meeting the standard of care required by law;
- reallocate healthcare services, program treatment, and staffing to meet healthcare needs of the offender population;
- provide metrics for cost containment and input to outsourcing strategies;
- provide public health data to identify and effectively respond to outbreaks, e.g., Hepatitis, and to identify trends among the population; and,
- capture performance, e.g., number of offenders with chronic conditions.



Grievances

An OMIS should track and respond to offender appeals of classification and disciplinary hearing decisions, and grievances. An OMIS should:

- analyze grievance data to identify potential operational issues; and,
- capture key performance measures related to the number of grievances, by type and location, and the extent of compliance to response times prescribed by policy.



Programs

An OMIS should assign an offender to programs, track attendance, maintain certifications and milestones achieved, monitor removals and withdrawals, and track program outcomes against treatment goals that have been defined in the case plan. An OMIS should:

- analyze data related to program enrollments and program outcomes, against offender recidivism and incidence of rule violations to assess relative effectiveness of individual programs;
- use data to determine the optimal duration of individual programs; and,
- re-allocate resources to programs that demonstrate relatively higher effectiveness.



Scheduling

An OMIS should automate the process of requesting and approving appointments with structured rules for appointment prioritization and generate a daily list of approved appointments and orders to report. An OMIS should:

- automate the offender scheduling function to help administrators determine appointment types and locations having relatively lower rates of fulfilled appointments; and,
- communicate appointments in a structured and consistent way that allows staff to ensure controlled movement of offenders and minimizes interruption of daily operations.



Security Threat Groups

An OMIS should ensure prison gangs and gang affiliations are identified and the agency has a consistent approach across all facilities to validate gang affiliation. An OMIS should:

- aggregate STG data to enable administrators to define policy and operating procedures to address risks associated with specific groups and locations; and,
- adhere to FBI standards to enable investigators to exchange information with law enforcement, potentially improving security within facilities and public safety in the community.



Property

An OMIS should track offender property and process mail. An OMIS should:

- investigate value of tracking articles sent and received through the mail room;
- enable administrators to better respond to offender grievances surrounding loss of property;
- streamline transportation processes by automatically generating list of articles to be transported with the offender; and,
- enable enforcement of policy regarding property limits and rules for sending and receiving mail.



Trust Accounting

An OMIS should track deposits into the offender's trust accounts, work assignments, and deposits made by family members. The system should automatically withhold a percentage of deposits and direct those deposits toward restitution and fees. An OMIS should:

- aggregate information on offender deposits and withdrawals across the offender population, and correlate the information with visiting lists, telephone calling lists, volunteers, and employees to help administrators and investigators detect illegal activity and potential security risks within institutions; and,
- provide performance metrics, including the percentage of restitution and fees that are paid, and reduce the length of time it takes for funds to be provided to released offenders.



Visitation

An OMIS should automate the visiting function to streamline processes and aid in policy compliance and support offender family relationships. An OMIS should:

- correlate information about who visited whom and when, with information about contraband and any other incidents to help investigators solve cases, and take action to guard against violations;
- provide visiting history to help create individualized re-entry programs; and,
- capture metrics, including the percentage of offenders having no visits.



Release and Discharge

An OMIS should generate rosters of offenders who are becoming eligible for release and parolees becoming eligible for discharge of supervision. An OMIS should:

- automate release and discharge functions to reduce the risk of offenders being released in error and risk of supervision being incorrectly terminated;
- correlate sentence and offense data with time served and release dates to reveal data entry errors to avert incorrect release; and,
- enable administrators to identify process improvements.



Community Supervision

An OMIS should assign a parolee to a parole officer and document conditions of supervision, including a supervision case plan, with offender goals. An OMIS should also provide a continuity of offender information across incarceration and parole periods to enable parole officers to make informed decisions regarding violations and sanctions.

SOURCE: PEER analysis of CTA's *Common Business Functions for Correctional Management Systems*.

Agency Response



STATE OF MISSISSIPPI
DEPARTMENT OF CORRECTIONS
BURL CAIN
COMMISSIONER

September 7, 2022

Honorable Ted Booth, Executive Director
Mississippi Legislative PEER Committee
501 North West Street, Suite 301A
Jackson, Mississippi 39201

Dear Director Booth:

The Mississippi Department of Corrections (MDOC) has reviewed the *Management of Offender Data and Records by the Mississippi Department of Corrections* report. The agency acknowledges many of the deficiencies noted in the report and will work to make corrections and improvements. Areas of focus will include but not limited to: user training, process reviews by departmental area to ensure staff understand system features that are available, thereby, eliminating the use of manual processes they have resorted to; review and tightening of user access and permissions; and auditing and cross-checking for data integrity.

The agency does not concur with several generalities and extrapolations listed in the report that indicate inaccurate information is provided to the legislature or that time computation is inaccurate. MDOC data provides a clear picture, though not a perfect picture, for the items being requested. Many legislative initiatives have benefited from MDOC data over the past twenty years and the decisions have held true. Further, the sentence computation module in Offendertrak has made auto-updates to active inmate records possible in response to changes in the parole law over the years, including but not limited to: the enactment of 10 for 30 trusty time, 30 for 30 trusty time, first-time offender parole eligibility, changes in parole eligibility for drug offenses, and most recently, enactment of expanded parole eligibility provided in Senate Bill 2975. Without the features available in the Offendertrak system, manual calculation for thousands of inmate records in these five (5) major law changes would not have been possible.

The document imaging system, implemented in the late 90s, has capacity to store scanned documents and was implemented with the intent of eliminating the need for hard copy files to travel as the inmates are transferred within a facility or to another facility. The Application Xtender system (Legato) can be readily accessed by all state, regional, and private facilities. The system and means for having information at the users fingertips are in place, but as the PEER report points out, policy, procedure, and practice should be aligned as such to take advantage of system features.

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The Offendertrak system has been in operation since 2003 and is approaching end-of-support. MDOC believes a new modern system will greatly benefit its operations. MDOC is slated to host informal product reviews in September with vendors offering commercial offender management systems to get acclimated to solutions in the current market. Next steps include launching a formal project with ITS and begin the analysis phase and RFP development. MDOC anticipates having the RFP ready for release by not later than May 2023.

The Offendertrak system includes all of the modules cited in the PEER report as recommended by Correctional Technology Association. A replacement system must also include these modules with enhanced modern features for capturing data, smart forms, and reporting.

The agency appreciates PEER's work in reviewing the offender management system, policies, and processes.

Respectfully,



Burl Cain
Commissioner

James F. (Ted) Booth, Executive Director

Legal and Reapportionment

Barton Norfleet, General Counsel

Ben Collins

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